

City and County of San Francisco
Department of City Planning

Environmental Impact Report

90 New Montgomery

Final
81.492E

DOCUMENTS DEPT.

JAN 17 1983

SAN FRANCISCO
PUBLIC LIBRARY

Publication Date: May 21, 1982

Public Comment Period: May 21, 1982
through June 24, 1982

Public Hearing Date: June 24, 1982

Certification Date: November 4, 1982

D
REF
711.4097
N623f



5/S

SAN FRANCISCO
PUBLIC LIBRARY

REFERENCE
BOOK

Not to be taken from the Library

SAN FRANCISCO PUBLIC LIBRARY



3 1223 03627 7573

**City and County of San Francisco
Department of City Planning**

Environmental Impact Report

90 New Montgomery

**Final
81.492E**

- Changes from the text of the Draft EIR are indicated by solid dots at the beginning of each revised paragraph or table.

D REF 711.4097 N623f

90 New Montgomery :
[final] environmental
1982.

3 1223 03627 7573

S.F. PUBLIC LIBRARY

TABLE OF CONTENTS

	<u>Page</u>
I. SUMMARY	1
II. PROJECT DESCRIPTION	6
III. ENVIRONMENTAL SETTING	17
A. Urban Design Factors	17
B. Employment, Housing, and Fiscal Factors.	19
C. Transportation	22
D. Air Quality	25
E. Geology, Seismology, and Hydrology	26
IV. ENVIRONMENTAL IMPACT.	29
A. Urban Design Factors and Shadows	30
B. Employment, Housing, and Fiscal Factors.	51
C. Transportation	63
D. Operational Air Quality.	75a
E. Construction Noise	78
F. Energy	81
G. Geology, Seismology, and Hydrology	86a
H. Emergency Response Plan.	89
I. Cultural	90
J. Growth Inducement.	90
V. MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL IMPACTS OF THE PROJECT.	92
VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED.	99
VII. ALTERNATIVES TO THE PROPOSED PROJECT.	100
● VIII. SUMMARY OF COMMENTS AND RESPONSES	110
IX. EIR AUTHORS, CONSULTANTS, ORGANIZATIONS AND PERSONS CONSULTED	171
X. DISTRIBUTION LIST	173
● XI. CERTIFICATION RESOLUTION.	178
XII. APPENDICES.	180

LIST OF FIGURESPage

1. Project Location	7
2. Project Site and Vicinity.	8
3. Existing Site from SE Corner, Mission / New Montgomery Streets	9
4. Ground Floor Plan.	11
5. Basement Plan.	12
6. Typical Floor Plan	14
7. Project Elevations: Mission Street and New Montgomery Street.	15
8. Project Elevations: Aldrich Alley and West.	16
9. Architecturally Significant Buildings Near the Project Site.	18
10. Outline of Proposed Project Looking Northeast from Moscone Center on Howard Street between Third and Fourth Streets	33
11. View of Project Looking North on New Montgomery Street	34
12. Building Heights Near the Project Site	35
●12a. New Montgomery Street Frontage	35a
13a. Shadow Patterns; September 24 / March 21, 8:30 a.m. and 9:30 a.m..	38
13b. Shadow Patterns; September 24 / March 21, 10 a.m. and 12 noon.	39
14a. Shadow Patterns; October 6 / March 8, 7:15 a.m. and 8:15 a.m..	40
14b. Shadow Patterns; October 6 / March 8, 9:15 a.m..	41
15a. Shadow Patterns; October 20 / February 23, 7:45 a.m. and 8:45 a.m..	42
15b. Shadow Patterns; October 20 / February 23, 9:45 a.m..	43
16a. Shadow Patterns; November 4 / February 8, 7:00 a.m. and 8:00 a.m..	44
16b. Shadow Patterns; November 4 / February 8, 9:00 a.m. and 10:00 a.m..	45
17a. Shadow Patterns; November 22 / January 21, 8:00 a.m. and 9:00 a.m..	46
17b. Shadow Patterns; November 22 / January 21, 10:00 a.m..	47
18a. Shadow Patterns; December 22, 8 a.m..	48
18b. Shadow Patterns; December 22, 9:00 a.m. and 10:00 a.m..	49
18c. Shadow Patterns; December 22, 11:00 a.m. and 12 noon	50
19. Muni Routes Near the Project Site.	67
20. Automobile and Service Access to the Site.	73
21. Projected Electrical Load Distribution Curves.	83
22. Projected Natural Gas Load Distribution Curves	84
23. Mission Street Loading Dock Alternative.	101
24. Pass-Through Loading Dock Alternative.	103
●24a. No Parking Alternative	104a
25. Guiding Downtown Development Alternative	106

LIST OF FIGURES (Continued)

	<u>Page</u>
● 25a. Alternative with Setback at the Height of the Call Building.	109a
C-1. Photos of Peak Muni Loading Conditions	186

LIST OF TABLES

	<u>Page</u>
1. Distribution of Property Tax Revenues from the Project Site for the Fiscal Year 1981-82.	21
● 2. Relationship between Applicable Urban Design Policies of the San Francisco Comprehensive Plan and the Proposed Project.	31
3. Projected Permanent Employment at the Project Site	52
● 3a. Comparisons of Land-Use and Employment Trend Approaches.	64d
4. Projected Daily Project-Generated Emissions in 1985 (tons/day) . . .	76
● 5. Projected Local Curbside Carbon Monoxide Impacts	77
6. Typical Commercial/Industrial Construction Noise Levels at 50 Feet	79
● B-1. Major Office Building Construction in San Francisco through 1981, in Gross Square Feet	183
● B-2. Projected Effects of Downtown Office Development on Regional Housing Markets, 1982 - 90	185
C-2. Existing Worst P.M. Peak-Hour Conditions on Outbound Muni Vehicles (Lines Passing Within 2,000 Feet of the Site).	187
C-3. Vehicular Levels of Service.	188
C-4. Project's Peak-Hour Travel by Mode (Person Trips).	189
C-5. Pedestrian Flow Regimen.	190
C-6. Anticipated Office Development within a 2000-Foot Radius of the Site.	191
C-7. Cumulative Office Development in Downtown San Francisco as of August 6, 1982	192
C-8. Gross Square Feet of Cumulative Office and Retail Development in Downtown San Francisco as of August 6, 1982	195
D. San Francisco Air Pollutant Summary 1978-1980.	196
E. Projects Included in Comparative Analysis of Energy Consumption. .	198
F. Tentative Geologic Profile of Site	199



Digitized by the Internet Archive
in 2016 with funding from
California State Library Califa/LSTA Grant

<https://archive.org/details/90newmontgomeryf4198sanf>

I. SUMMARY

PROJECT DESCRIPTION

The proposed project is sponsored by Highfield Montgomery Corporation. The sponsor proposes to build a 15-story office building containing about 135,500 gross sq. ft. The street level would provide retail space and a loading dock to serve the project. Parking for 23 vehicles would be provided in the basement area, which contains about 11,500 gross sq. ft.

The project site, which contains approximately 9,800 sq. ft., is located at the northwest corner of the intersection of New Montgomery and Mission Sts., with frontages of approximately 80 ft. on New Montgomery St. and 120 ft. on Mission St. The site is bounded on the north by Aldrich Alley; it is currently used as a parking garage. The project would be located directly south of the Call Building and across Mission St. from the Rialto Building, both rated "A" in the Heritage survey of architecturally significant buildings in downtown San Francisco.

PROJECT EFFECTS

The project would require demolition of two levels of the existing parking garage on the site (ground level and second-story level); the basement parking level would be retained. The project would comply with the basic use, height, and bulk provisions of the City Planning Code and with the current moratorium on the use of floor area bonuses.

There are several architecturally significant buildings near the project site. According to the project architect, the exterior of the project structure has been designed to be compatible with the nearby buildings which have been rated in architectural surveys.

The project would cast new shadows on the Call Building, the Sheraton Palace Hotel including the Garden Court, and New Montgomery St. With the project, new shadows would advance and recede across the translucent glass roof of the Garden Court from late September to late March during early-morning hours; the effect on any given day would be barely noticeable.

At full occupancy, the project would create about 515 jobs. A demand for 110 housing units in San Francisco could be generated by the project. The project would require about 85 person-years of construction labor.

The project would generate directly about 215 Muni trips during the evening peak hour. Regional transit systems would have about 260 additional p.m.-peak-hour trips generated directly by the project. A demand for about 130 long-term parking spaces and 30 short-term spaces would be generated by the project. Access and egress to and from the basement-level parking would be provided via a one-lane ramp with the entrance from Aldrich Alley. Vans and service vehicles would reach the (Aldrich Alley) loading dock via a right-turn from New Montgomery St. on to Aldrich Alley; for egress, trucks would drive to the west down Aldrich Alley, turn left at Annie St., then turn onto Mission St.

Other project-related impacts would be generally typical of most Downtown office projects. Noise effects would occur during construction, primarily from pile driving. Project construction and operation would result in increased energy consumption; the project would comply with Title 24 requirements. Geotechnic and seismic constraints that apply to the project would be resolved through implementation of engineering and design measures recommended by the project soils engineer.

CUMULATIVE EFFECTS OF DOWNTOWN DEVELOPMENT

- The proposed project, together with other major downtown office buildings under construction or proposed, would add approximately 17.4 million gross sq. ft. to the 57.2 million sq. ft. that now exists in the City. This individual and cumulative development would continue a trend of growth in service-sector and office headquarters activities in downtown San Francisco.

Cumulative parking demand would be greater than the available supply of spaces, eliminating the existing seven percent vacancy rate within 2,000 ft. of the project. Increases in demand for public transportation services would result in a spreading of the peak-of-the-peak ridership conditions on most carriers, with increased incidents of overloading most likely to occur on Muni, Golden Gate Transit buses, and BART transbay trains.

MAJOR MITIGATION MEASURES

Mitigation measures proposed as part of the project include the following:

- On January 27, 1982, the project sponsor, Highfield Holdings, Inc., and California Jones Company entered into an agreement with the City and County of San Francisco (signed by Dean L. Macris, Director of Planning) relating to office building housing requirements. Of the 377 housing credits awarded to Highfield from this agreement, they will apply 112 to meet the housing demand generated by this project as calculated using the DCP formula.
- Vehicle-activated signals would be installed at both ends of the garage ramp, to prevent head-on conflicts between inbound and outbound vehicles on the one-lane ramp and to warn pedestrians on the sidewalk of the approach of outbound vehicles.
- The curb-to-curb width of Aldrich Alley would be increased from 7.5 ft. to 10 ft. for the length of the site to facilitate access to the enclosed loading dock.
- The project sponsor would provide three parking spaces for bicycles, and one parking space for handicapped persons in order to decrease congestion caused by such persons (who may not have access to other modes of travel) searching for parking spaces.
- A transportation broker in the project management office would encourage transit use through the on-site sale of BART, Muni, and Golden Gate

Transit passes to employees, and by distributing transit information. The broker would provide a central clearinghouse for carpool information in cooperation with the non-profit RIDES for Bay Area commuters.

- The project would be equipped with a trash compactor to reduce the volume of solid waste requiring storage and to reduce the number of service trips to the site. Storage space for recyclable waste material containers would be provided for office use.

ALTERNATIVES

The following alternatives to the proposed project are discussed in Section VII of this report:

- A. The No-Project Alternative would continue the use of the existing parking garage.
- B. The Mission St. Loading Dock Alternative would provide a loading dock with access from and egress to Mission St.
- C. The Pass-through Loading Dock Alternative would provide a loading dock with access from Aldrich Alley and egress on Mission St.
- D. The No-Parking Alternative would eliminate the 23-space parking garage in the basement level of the proposed project. The project sponsor would prefer to build this alternative rather than the project described in II. Project Description. Exterior building materials would be precast concrete.
- E. The Housing Alternative would be a mixed-use project providing on-site housing and office space.
- F. The Guiding Downtown Development (GDD) Alternative would be a building designed to meet the criteria outlined in GDD, published in May 1981 by the Department of City Planning. The structure would provide maximum office space allowed without providing housing on the site. GDD's height/bulk proposed for the site is 500-S; the proposed FAR would be

12:1. Under this alternative, the building would be a 12-story office building, with ground level retail, similar to the proposed project.

- G. The Eighty-Foot-High Concrete Building Alternative would be a structure designed with a height and exterior building materials which are similar to those of the Call Building.
- H. The Building with Setback at the Height of the Call Building would be a structure designed with a setback at the height of 80 ft., the height of the Call Building. This alternative would be one story taller than the project; it would be similar to the project in other aspects.

II. PROJECT DESCRIPTION

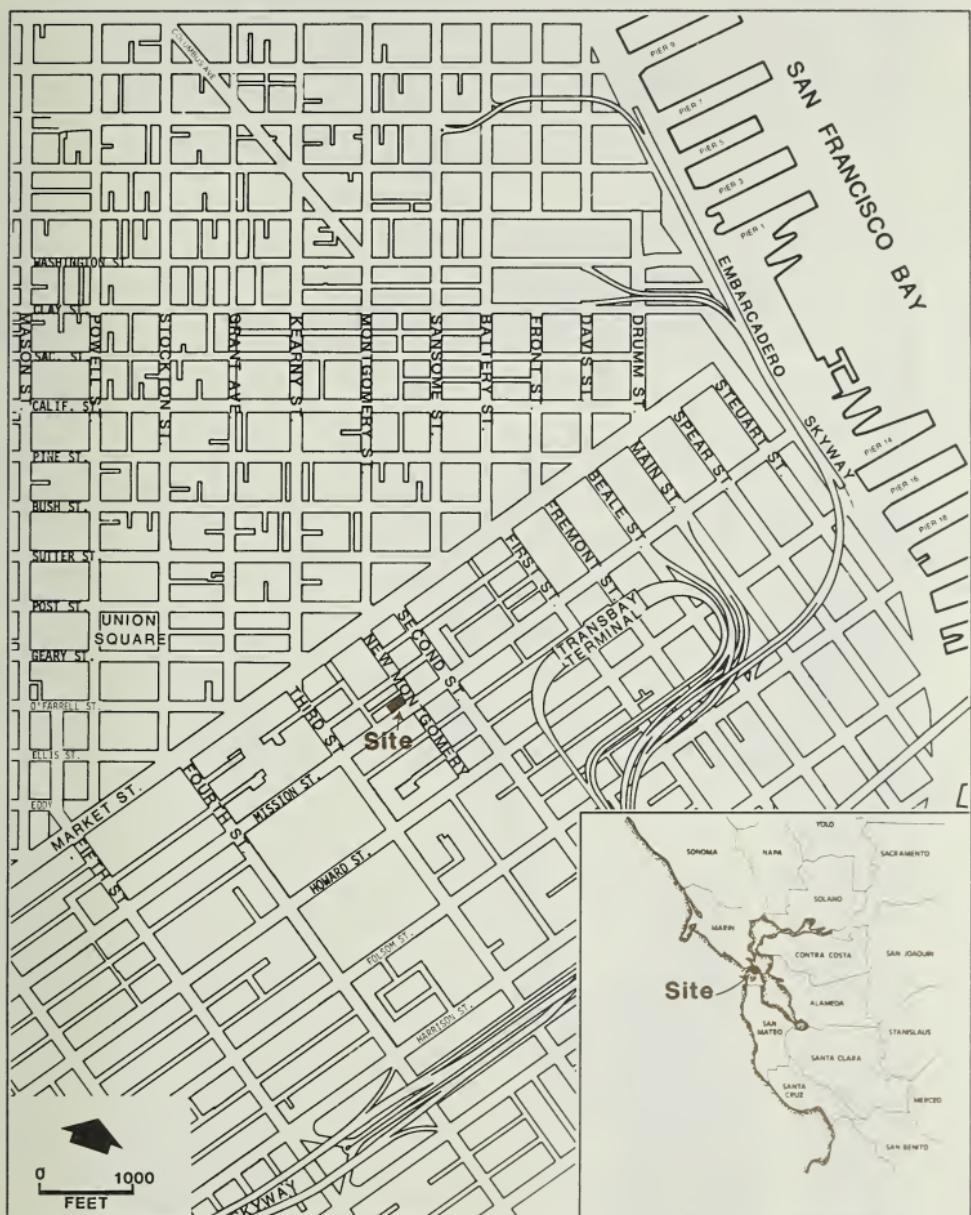
A. OBJECTIVES OF THE PROJECT SPONSOR

The project sponsor is Highfield Montgomery Corporation, a Canadian corporation based in Vancouver, British Columbia. The sponsor's objective is to obtain a return on capital invested in constructing and renting space in an office building in downtown San Francisco. The project is proposed at this time to help meet the market demand for office space in downtown San Francisco. The project architect is the firm of Gensler and Associates, San Francisco. Peter Gordon is project manager for the architect.

B. LOCATION OF THE PROPOSED PROJECT

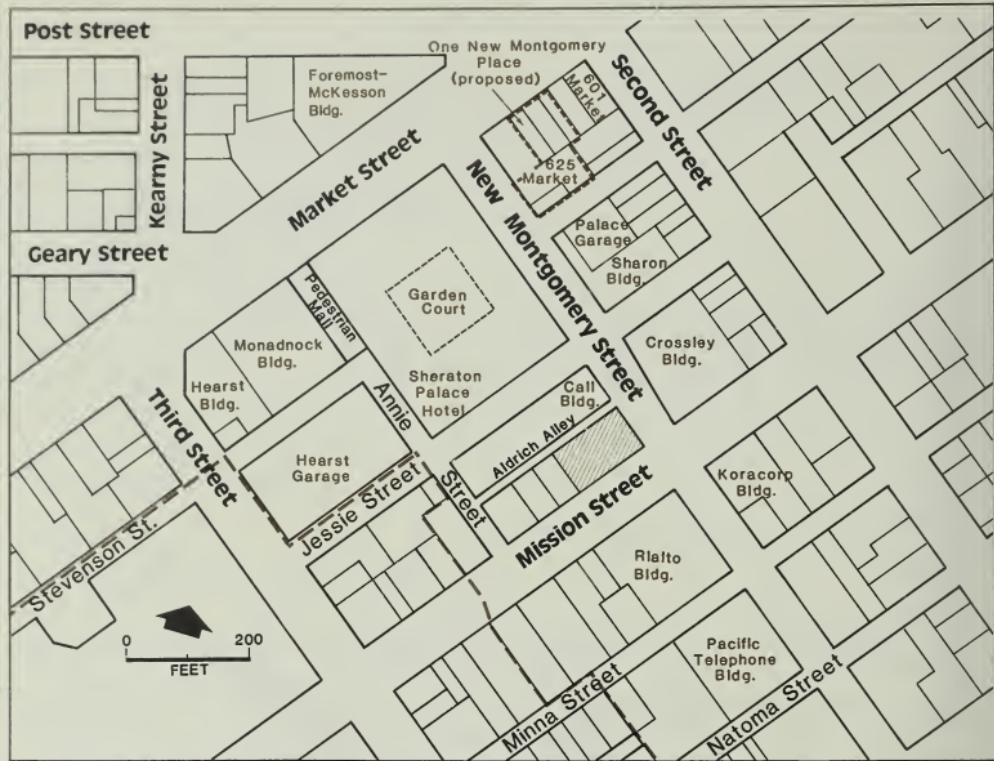
The proposed 15-story office building would be located at the northwest corner of the intersection of New Montgomery and Mission Sts. (see Figures 1 and 2, pp. 7 and 8). The site is currently used as a three-level parking garage, including one basement level, and encompasses Lot 16 of Assessor's Block 3707 (see Figure 3, p. 9). It is in the C-3-O (Downtown Office) Use District and the 500-I Height and Bulk District; permitted floor area ratio (FAR) for the site is 14:1.

The site is an irregular rectangle with frontages of approximately 80 ft. on New Montgomery St. and 120 ft. on Mission St., and is approximately 9,800 sq. ft. in area. It is bounded on the north by Aldrich Alley. This passageway is 12 ft. wide, including a seven-ft.-wide roadway with 2.5-ft.-wide sidewalks on both sides. With project implementation, the passageway between the two buildings would be widened to about 14.5 ft. for the length of the site, including a ten-ft.-wide roadway and a two-ft.-wide sidewalk adjacent to the project.



SOURCE: Environmental Science
Associates, Inc.

FIGURE 1: Project Location



Legend

- Project Site
- YBC Redevelopment Area

SOURCE: Environmental Science Associates, Inc.

FIGURE 2: Project Site and Vicinity



FIGURE 3: Existing Site From SE Corner, Mission and New Montgomery Streets

Proposed Project Site

SOURCE: Environmental Science Associates

C. SITE AND BUILDING PLAN

The proposed 15-story building with street-level retail uses would be approximately 240 ft. tall including the mechanical penthouse; it would contain approximately 135,500 gross sq. ft. of floor area. In addition, the basement level would contain about 11,500 gross sq. ft. The ground floor would contain approximately 3,350 gross sq. ft. of retail space, the lobby providing access to offices on the upper floors, and an off-street loading dock (see Figure 4, p. 11).

One pedestrian entrance would be located along the New Montgomery frontage of the building to provide access to the building lobby and to the retail space in the eastern portion of the building at the ground floor level. A pedestrian entrance on Mission St. would provide access to the retail space located in the western portion of the ground floor of the building. Retail space would have clear glass windows along the sidewalk.

A loading dock would be provided with access from Aldrich Alley. Pursuant to discussions with the Department of Public Works, the alley would be widened along the project frontage to facilitate access to the dock. To unload, trucks would turn right from New Montgomery St. (which is one-way southbound) onto Aldrich Alley, drive about 150 ft. down the passageway, and back into the loading dock area. For egress, the trucks would continue westward down Aldrich Alley, turn left onto Annie St., and turn onto Mission St.

The basement would contain 10,100 sq. ft. of parking and driveway area and 1,400 sq. ft. of storage and mechanical equipment space (see Figure 5, p. 12). From New Montgomery St., cars would enter the parking garage in the basement via a one-lane ramp with access from Aldrich Alley, the one-lane street adjacent to the site on the north. When leaving the garage, cars would enter New Montgomery St. via the ramp and Aldrich Alley. There would be 23 parking spaces, including one oversized space designated for handicapped persons. Three bicycle parking spaces would also be provided. Parking space is currently provided in the existing basement including space under the public sidewalks along New Montgomery and Mission Sts.; this existing

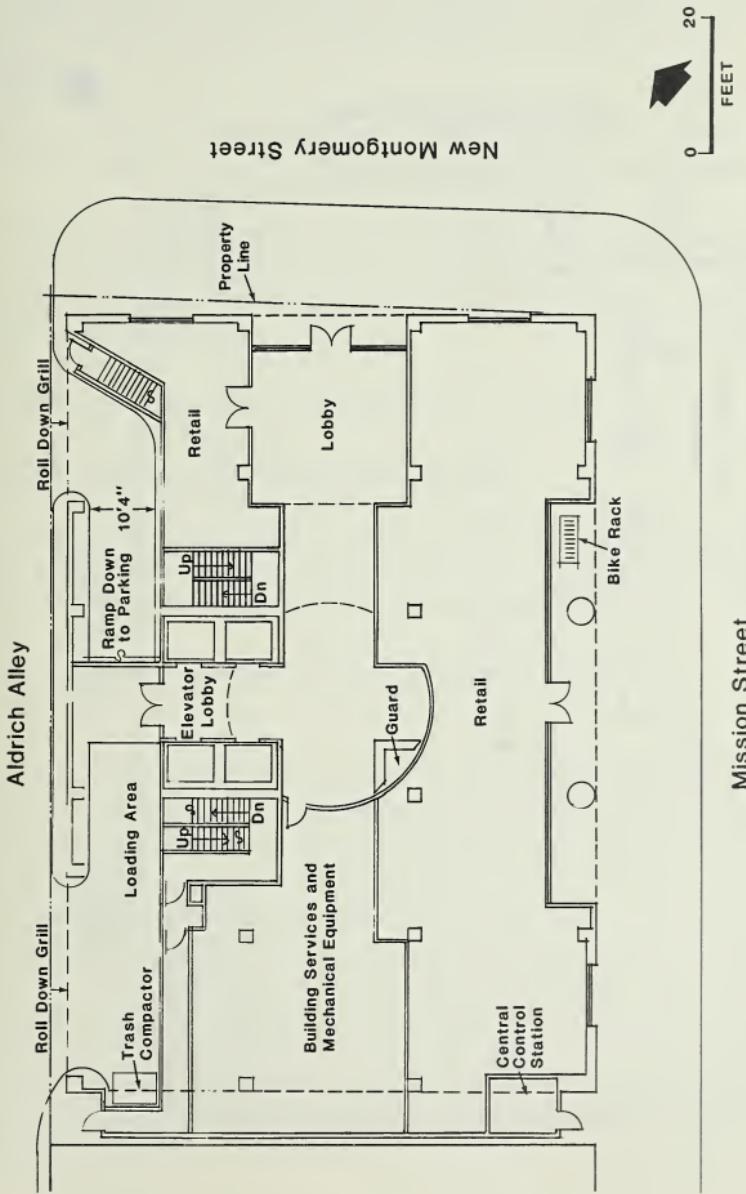


FIGURE 4: Ground Floor Plan

SOURCE: Genster and Associates

arrangement would be continued with the basement plan as proposed in the project. Vertical clearance in the garage and on the ramp would be 7 ft. 10 in.

Each of the upper 14 floors would contain about 8,900 gross sq. ft. for a total of 124,300 gross sq. ft. of office space (see Figure 6, p. 14).

The structure would be rectilinear in form (see Figures 7 and 8, pp. 15 and 16). The building exterior would consist of aluminum spandrel panels. Clear glass would be used on the first and second levels; grey-tinted glass would be used above the second level.

Approximately 515 people would be employed at the site.

D. PROJECT SCHEDULE, COST, AND REQUIRED APPROVALS

Environmental review and detailed project design are expected to be completed by the fall of 1982. Following permit approvals, project construction would begin. Initial occupancy is expected in early 1984.

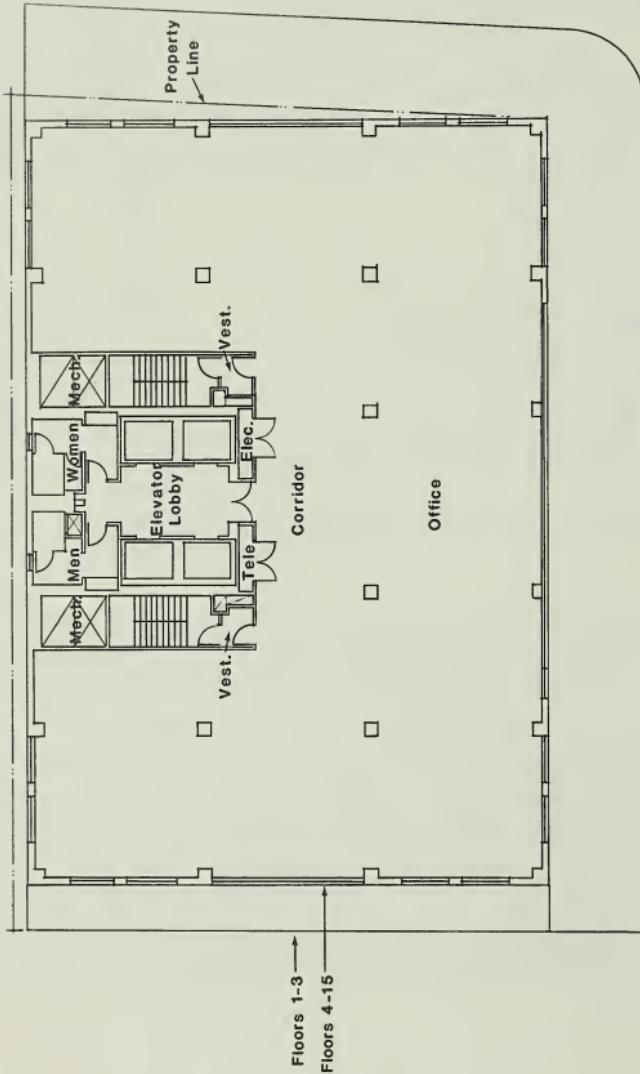
The project would have a fair market value of about \$19 million (in 1982 dollars).

The project would comply with the provisions of the City Planning Code currently in effect and therefore requires no conditional use authorization and no variances to the Planning Code. Following certification of this EIR as adequate, accurate, and objective by the City Planning Commission, the project would be subject to review by the City Planning Commission in accordance with Resolution 8474, approved January 17, 1980, requiring discretionary review of all projects in the Downtown area. The project sponsor then would obtain a demolition permit from the Central Permit Bureau of the Department of Public Works, followed by a building permit or permits administratively approved for compliance with fire, electrical, building, and other pertinent City codes, and with conditions established by the City Planning Commission in its discretionary review.

Aldrich Alley

New Montgomery Street

0 20
FEET

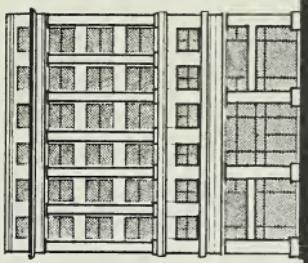


SOURCE: Gensler and Associates

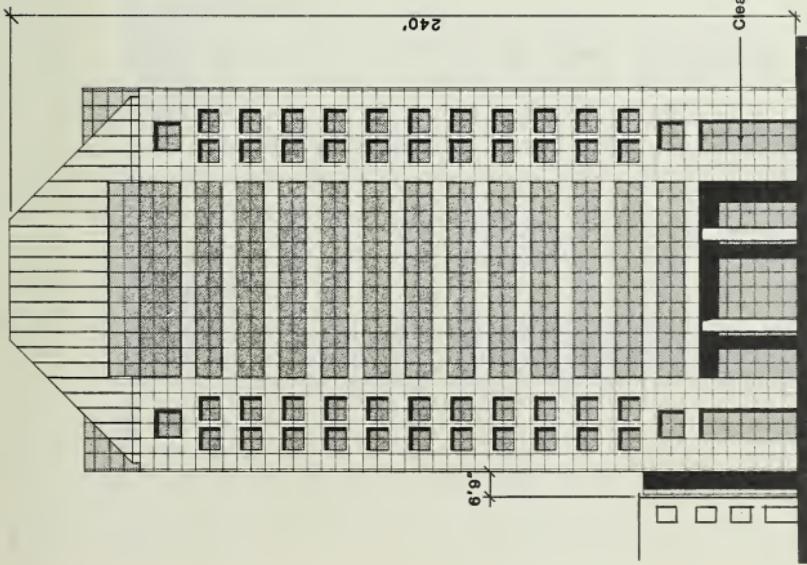
FIGURE 6 : Typical Floor Plan

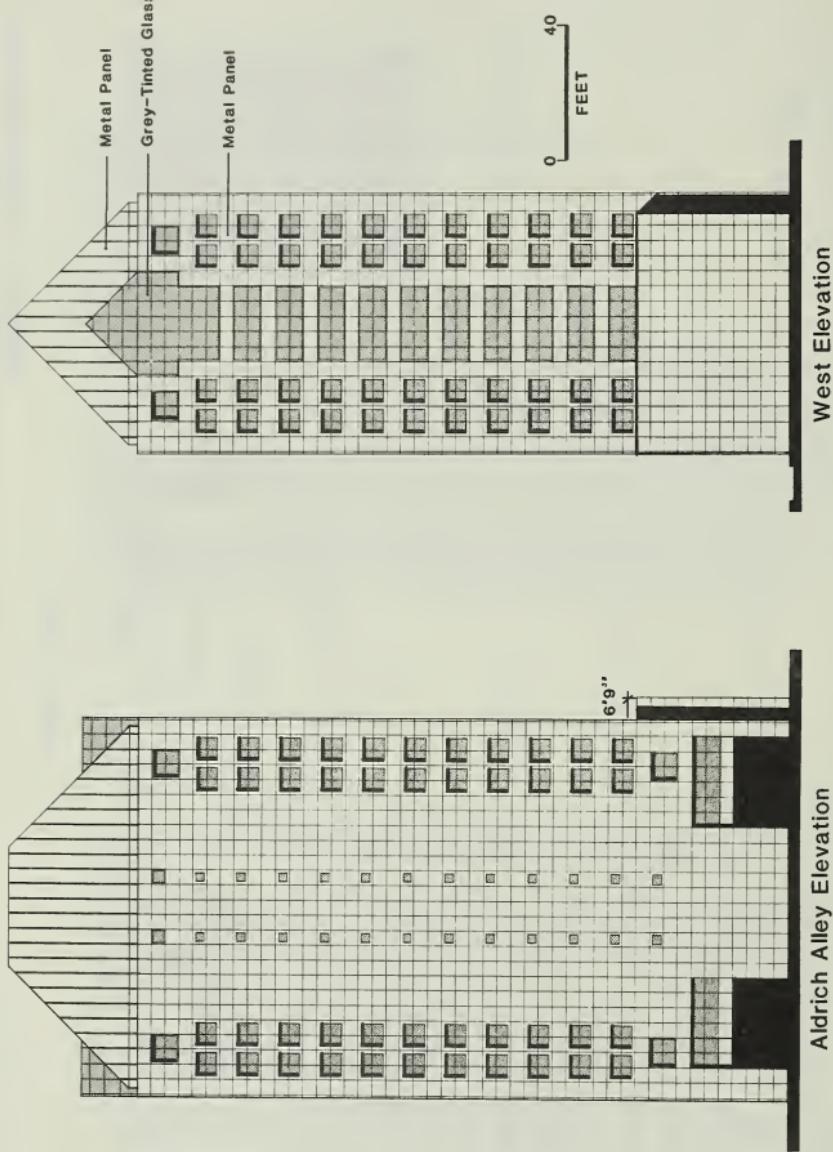
FIGURE 7: Project Elevations

New Montgomery Street Elevation



Mission Street Elevation





SOURCE: Gensler and Associates

FIGURE 8: Project Elevations

III. ENVIRONMENTAL SETTING

A. URBAN DESIGN FACTORS

The project site is located south of Market St. in a block that is divided by a network of secondary streets and alleys into a series of "mini blocks." These streets, which were originally established to create small residential lots, break up the large block area, permitting increased pedestrian accessibility. Surrounding structures are mainly two- to nine-story buildings, built up to lot lines and of post-earthquake construction (between 1906 and 1925). Building materials consist primarily of steel frames and brick and stone masonry, with various ornamental features (such as elaborate terra cotta carvings) incorporated into the building facades to accent architectural elements such as entrances and cornices. The building size and massing in the area maintains a human scale that provides a streetscape setting with visual interest for the pedestrian.

- There are no architecturally and/or historically significant buildings on the site. However, the project vicinity contains numerous buildings (see Figure 9, p. 18) that are included in the Department of City Planning Inventory of Architecturally Significant Buildings, and in the Survey for the Foundation for San Francisco's Architectural Heritage (see Appendix A, p. 181 for a description of the surveys and their rating systems). Structures of particular architectural significance are the A-rated Call Building, adjacent to the north of the site and the A-rated Rialto Building, across Mission St. directly south of the site. These buildings establish a visual linkage along New Montgomery St., repeating the architectural scale, pattern and textures of the New Montgomery St. setting. The Rialto Building has arched entryways, brick facade treatment and defined horizontal building lines which provide the pedestrian with scale-giving reference points. The balanced composition of the upper portion of the Call Building creates a sense of formality that is in keeping with buildings fronting on New Montgomery St., such as the Sharon, the Rialto, and the Crossley Buildings. The Sheraton Palace Hotel, north of the Call Building, is an A-rated building whose Garden Court has been designated as City Landmark No. 18.

Post Street

Kearny Street

Geary Street

Market Street

Second Street

15

16

17

18

19

12

13

Annie

1

Aldrich Alley

Site

Third street

Jessie Street

10th Street

Mission Street

Stevenson St.

0

200 FEET

25

26

27

28

29

30

Minna Street

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

98

99

100

101

102

103

104

105

106

107

108

109

110

111

112

113

114

115

116

117

118

119

120

121

122

123

124

125

126

127

128

129

130

131

132

133

134

135

136

137

138

139

140

141

142

143

144

145

146

147

148

149

150

151

152

153

154

155

156

157

158

159

160

161

162

163

164

165

166

167

168

169

170

171

172

173

174

175

176

177

178

179

180

181

182

183

184

185

186

187

188

189

190

191

192

193

194

195

196

197

198

199

200

Legend

Building	S.F. DCP Inventory*	Heritage Survey*
On Site Street:		
1 74-80 Montgomery, Call Bldg.**	3	A
2 652-654 Mission, Standard	3	C
3 658-664 Mission, Graphics Bldg.	3	C
4 666 Mission	1	C
5 674-676 Mission, Gallatin Bldg.	1	C
6 87-97 Third, Grace Bldg.		C
7 81-85 Third		C
8 71-77 Third, Breen's Fine Food**	B	C
9 167-179 Jessie, Hotel Jessie	B	C
10 163-165 Jessie, Hess Bldg.	C	C
11 17-29 Third	C	C
12 691-699 Market, Hearst Bldg.**	3	B
13 673-687 Market, Monadnock Bldg.**	3	B
14 633-665 Market, Sheraton Palace Hotel, ** Garden Court	4	A
City Landmark		

Building	S.F. DCP Inventory*	Heritage Survey*
19 79 New Montgomery, Crossley Bldg.		C
20 617-623 Mission, Koracorp Bldg.		C
21 111-121 New Montgomery, Standard		C
22 137-159 New Montgomery		C
23 170-180 New Montgomery, Furniture Exchange		C
24 134-140 New Montgomery, Pacific Telephone and Telegraph Co. Bldg.**	4	A
25 116 New Montgomery, Rialto Bldg.**	3	A
Fronting on Mission		
26 641-643 Mission		C
27 647-649 Mission, Veronica Bldg.	1	C
28 657 Mission, McLaughlin Bldg.		C
29 663-671 Mission, Grant Bldg.		C
30 101-107 Third, Williams Bldg.**		B

*See Appendix A for discussion of surveys and ratings.

**Architecturally and/or Historically Significant Buildings in City Planning Commission Resolution No. 8600

Study Boundary

FIGURE 9: Architecturally Significant Buildings Near the Project Site

SOURCE: Environmental Science Associates, Inc.

III. Environmental Setting

The Rialto Building is located in the southwestern corner of the Mission/New Montgomery intersection. The C-rated Koracorp Building is located in the southeastern corner of the intersection and the C-rated Crossley Building is located in the northeastern corner. The architectural integrity of the project intersection is reinforced by the siting of these three buildings because of their similarity in height, massing and architectural style. The presence of the two-story parking structure on the project site weakens the visual cohesiveness of this intersection because of its small scale and dissimilar textures.

B. EMPLOYMENT, HOUSING, AND FISCAL FACTORS

LOCAL AND REGIONAL COMMERCIAL SPACE AND EMPLOYMENT

- San Francisco is the major office center in the Bay Area, with approximately 57.2 million gross sq. ft. of office space at the end of 1981.^{1/} Approximately 32.3 million gross sq. ft. were constructed between 1960 and 1981 (see Appendix B, Table B-1, p. 183) in downtown San Francisco. In the 1960s, the amount of office space constructed averaged about 1.1 million gross sq. ft. per year. During the 1970s office space was added at a rate of about 1.5 million gross sq. ft. per year. In the first two years of this decade (1980 and 1981) the average annual office space added was approximately 2.0 million gross sq. ft. An additional 7.8 million gross sq. ft. of office space will be added when buildings under construction (as of August 1982) are completed; another 5.4 million sq. ft. of office space has been approved but is not yet under construction; 4.2 million gross sq. ft. of office space has been proposed and is under formal review by the Department of City Planning. The amount of office space in the downtown area has increased steadily in the past two decades and will likely continue to increase in the next several years.

The largest employment growth in the Bay Area from 1970 to 1978 occurred in the office sector, which accounted for over 60% of the regional increase in the total work force. A total of 1.2 million people in 1978 held office jobs in the Bay Area, with nearly 70% employed by firms serving the local

III. Environmental Setting

population. Over 55% of the 280,000 office workers employed in San Francisco worked for employers such as national or regional headquarters which serve a wider geographical area./2/

III. Environmental Setting

In early 1981, annual rents in the newer downtown office buildings ranged from about \$24 to \$35 per sq. ft. Office space in the buildings that will go on the market in 1984 is expected to command annual rents of between \$35 and \$50 per sq. ft. In December, 1981, the vacancy rate in downtown office buildings was estimated to be 0.36% according to a real estate survey./3/ Low vacancy rates coupled with rapidly growing rents suggest that the supply of new office space in San Francisco has not kept pace with demand.

With the apparent shortage of office space in San Francisco as one influential factor, some potential users of San Francisco office space have located elsewhere. While the City houses 60% of the Bay Area office space, 56% of the new construction, based on building permit value, took place outside of the City from 1972 to 1979./4/ Cheaper space in outlying areas attracts companies that do not need a downtown San Francisco location or that can shift their support functions out of the City. For example, approximately 9 million sq. ft. of new office space is under construction or planned in the next ten years in major projects in San Mateo County. Office space construction in Contra Costa County is averaging one million sq. ft. a year. Additionally, over 10 million sq. ft. of office space is under construction or planned in the next ten years in Oakland./5/ Annual rents for new office space in these areas average from about \$15 to \$18 per sq. ft.

EMPLOYMENT AT THE PROJECT SITE

The parking garage now operating at the project site employs about ten persons. There are no other uses or businesses on the project site.

THE HOUSING MARKET

Both regional and San Francisco housing stock are characterized by low growth, low vacancy rates and high purchase and rental costs in relation to typical wages paid. These factors combined have tended to constrict the supply and affordability of housing in San Francisco.

FISCAL FACTORS

The market value of the property on the project site in 1981 was approximately \$850,000./6/ At the fiscal year 1981-82 property tax rate of \$1.19 per \$100 of fair market valuation, the parcel generated about \$10,150 in property tax revenues, distributed as shown in Table 1.

TABLE 1: DISTRIBUTION OF PROPERTY TAX REVENUES FROM THE PROJECT SITE FOR THE FISCAL YEAR 1981-82

<u>Agency</u>	<u>Ad Valorem Tax Rate</u>	<u>Percent</u>	<u>Revenues*</u>
City and County of San Francisco	\$0.945	79.4	\$8,060
S.F. Unified School District	0.142	11.9	1,208
S.F. Community College District	0.025	2.1	213
Bay Area Air Quality Management District	0.002	0.2	20
BART	<u>0.076</u>	<u>6.4</u>	<u>650</u>
<u>TOTAL</u>	<u>\$1.19</u>	<u>100.0</u>	<u>\$10,151</u>

* Based on the 1981-82 composite tax rate of \$1.19 per \$100 of fair market valuation.

SOURCE: San Francisco Controller's Office

Average annual earnings of the ten employees at the site in 1981 are estimated to be \$10,000./7/ At the 1980-81 payroll rate of 1.5% of total earnings, present employment is estimated to generate about \$1,500 in payroll taxes to the City.

Based on the present business on the site and the number of employees and wages paid, the revenue to the City and County of San Francisco from the parking tax, payroll tax, and property tax totaled about \$55,000 in 1981.

III. Environmental Setting

The City incurs costs in serving the existing project site. Police, fire, and general government expenditures are supported primarily by the General Fund. Most street maintenance, street improvement, and traffic control costs are supported by other revenue such as fees, fines, and federal and state aid.

NOTES - Employment, Housing, and Fiscal Factors

/1/ San Francisco Department of City Planning, August 1982, "Major Office Building Construction in San Francisco through 1981." See Table B-1, p. 183.

/2/ Association of Bay Area Governments (ABAG) and Bay Area Council, December, 1979, San Francisco Bay Area Economic Profile.

/3/ Coldwell Banker, "Office Survey Vacancy Index," December 28, 1981.

/4/ Association of Bay Area Governments (ABAG), April, 1981, Bay Area Office Growth, Working Papers on the Region's Economy, Number One.

/5/ Oakland Department of City Planning, January 26, 1982, "Major Buildings in the Central District."

/6/ Vernon Emmerson, San Francisco Assessor's Office, telephone conversation, January 21, 1982.

/7/ Former parking lot attendant (E. Araujo, April 16, 1982) stated that San Francisco parking attendants receive relatively low wages (\$3.50 to \$4.00 per hour). This would be \$7,280 to \$8,320 per year for a full-time employee. An average of \$10,000 per year per full-time employee was used because managerial personnel would be paid higher wages, about \$5.00 to \$8.00 per hour. This would amount to \$10,400 to \$16,640 per year.

C. TRANSPORTATION

PUBLIC TRANSIT

Within a distance of 2,000 ft. of the site are about 30 Muni lines, carrying approximately 30,000 passengers into and out of the downtown area during the peak hours of the morning and evening commute periods. Peak loading differs among these routes; on some routes there are few standees, whereas on others the aisle space is jammed. Photographs of typical crowded peak-hour conditions are shown in Figure C-1, Appendix C, p. 186. They were selected from more than 100 photographs taken on various Muni routes at heavy load points selected with advice from the Muni Planning Division, during the

morning and afternoon peak-hours. Appendix C, Table C-2, p. 187, shows conditions on lines passing within walking distance of the site.

Muni Metro and BART subway lines may be boarded at the nearby Montgomery Station on Market St. The Transbay Terminal (AC Transit), is about 1500 ft. east of the site. SamTrans has stops along Mission St. and Golden Gate Transit has stops along Howard and Folsom Sts. near the site.

PEDESTRIANS

Sidewalks by the site on Mission and New Montgomery Sts. are 15 ft. wide (12 ft. effective width). During the p.m. peak hour, the New Montgomery St. sidewalk carries about 600 pedestrians and operates in an unimpeded condition. Only about 100 pedestrians walk past the site on the Mission St. sidewalk during the p.m. peak-hour. Each of the crosswalks across Mission St. at New Montgomery St. receive greater use during the peak hour, by about 1,000 pedestrians per hour. Platoons of pedestrians entering these crosswalks use about half of the time available to them to leave the curb. As the last person to leave the reservoir space does so about halfway through the New Montgomery St. green signal, these crosswalks function at about 50% of capacity./1/

The "sidewalks" on Aldrich Alley are 2.5 ft. wide. The alley terminates at Annie St. and is seldom used by pedestrians, who more commonly use Jessie or Mission St. sidewalks.

VEHICULAR TRAFFIC

New Montgomery St. is one-way, southbound, with three lanes in its approach to Mission St. The curb lane is designated as a right-turn lane, so that parking at curbside is prohibited by a red zone all along the New Montgomery St. side of the site. About 200 vehicles make this right-turn movement during the p.m. peak hour./2/ Pedestrians encountered in the west crosswalk across Mission St. delay this movement somewhat, so that vehicles are lined up in the curb lane all along the site at some time during most of the peak-hour signal cycles.

III. Environmental Setting

Mission St. has one traffic lane and one "diamond" (transit and right-turn only) lane in each direction. The curb lanes are tow-away zones during the pertinent peak hours. Along the Mission St. frontage of the site, there are two curb cuts providing access to the existing garage on the site, and one metered parking space. There are about 100 buses per hour on Mission St. during the a.m. and p.m. peak hour. Overall operating conditions at the intersections of Mission and New Montgomery Sts. may be described as Level of Service C (see Table C-3, p. 188), with most vehicles not delayed by more than one signal cycle.

PARKING

Two recent analyses and surveys of parking availability in the vicinity of the site have found that vacancies in offstreet parking spaces average about seven percent with most of the vacancies occurring more than 1,000 ft. south of Mission St./3/ There are roughly 10,000 spaces within 2,000 ft. of the site, so that fewer than 1,000 spaces remain available on a given weekday.

There is one metered space at curbside along the site frontage on Mission St. which is in a tow-away zone during a.m. and p.m. peak hours. The remaining curbside space is a designated red zone, except for four curb cuts serving the parking garage on-site. This three-level garage parks about 100 vehicles.

NOTES - Transportation

/1/ From observations made between 4:30 and 5:30 p.m. on Monday, January 11, 1982, by the consultant, Environmental Science Associates.

/2/ P.M. peak-hour (4:30 - 5:30) vehicle counts were taken by the Department of Public Works on Wednesday, January 13, 1981. Southbound counts for left-, through, and right-turn movements were 136, 576, and 212, respectively. Left-, through, and right-turn counts were 0, 625, 173, respectively, for the eastbound approach and 49 (buses), 668, 0, respectively, for the westbound approach.

/3/ Parking surveys published in the 135 Main Building FEIR, certified March 25, 1982, and the Five Fremont Center FEIR, certified March 12, 1981, were conducted in areas including and east of the site, during July 1980 and July 1981. The Yerba Buena Center Second Supplement DEIR, estimated date of publication, May 27, 1982, describes parking availability in the area west of the site. Parking surveys in the YBC area were updated in November, 1980 and January, 1981.

D. AIR QUALITY

The nine-county San Francisco Bay air basin is designated by the California Air Resources Board (CARB) as a nonattainment area for ozone (O₃, or photochemical oxidant) and carbon monoxide (CO); San Francisco is also a nonattainment area for total suspended particulate (TSP). Nonattainment means that the federal ambient air quality standards for these pollutants have been exceeded within the past two to three years. As required by the federal Clean Air Act Amendments of 1977, a regional Air Quality Plan/1/ has been adopted which establishes control strategies (stationary and mobile source emission controls and transportation improvements) to attain the standards for these pollutants by 1987. The Bay Area Air Quality Management District (BAAQMD), Metropolitan Transportation Commission (MTC), and CARB have primary responsibility for implementation of these strategies.

Ozone is not emitted directly but is a secondary pollutant formed in the atmosphere by a complex series of photochemical reactions involving emitted hydrocarbons (HC) and nitrogen oxides (NO_x). Production and accumulation of significant ozone concentrations requires about one to three hours in strong sunlight in a stable atmosphere, where mixing and diffusion is at a minimum. Ozone air pollution is thus a regional phenomenon because the precursor pollutants are carried downwind before the reaction process is complete. In contrast, CO and TSP concentrations reflect local emission sources; concentrations are highest at the source and decrease as the pollutants are dispersed by wind.

San Francisco's air quality, in general, is the least degraded of all the developed portions of the Bay Area. Because of the prevailing westerly and northwesterly winds, San Francisco is more a generator of its own air quality problems (especially CO and TSP) and a contributor to those in other parts of the Bay Area (especially ozone), than a recipient of pollutants from elsewhere.

The BAAQMD now operates an air quality monitoring station approximately 2.3 miles to the south of the site at 900 23rd St; prior to 1980, the monitoring station was located at 939 Ellis St. A three-year summary of the data collected at the stations and the corresponding ambient air quality

III. Environmental Setting

standards are shown in Appendix D, p. 129. These data show occasional excesses of the most stringent ozone, CO, TSP, and nitrogen dioxide standards.

Highest annual pollutant concentrations in San Francisco, while exhibiting fluctuations due to variations in meteorology, have shown an overall improvement during the 1971-1980 period. No similar trend in the annual number of standard excesses is evident; however, such excesses are infrequent.

Motor vehicles are the largest source of CO, HC, and NO_x in San Francisco, while paved street travel and power plant fuel combustion are the largest sources of TSP and sulfur oxides (SO_x), respectively./2/

NOTES - Air Quality

/1/ Association of Bay Area Governments (ABAG), BAAQMD, and Metropolitan Transportation Commission, January 1979, 1979 Bay Area Air Quality Plan, San Francisco Bay Area Environmental Management Plan.

/2/ California Air Resources Board (CARB), 1979, Emission Inventory 1976.

E. GEOLOGY, SEISMOLOGY, AND HYDROLOGY /1/

TOPOGRAPHY

The site is located on generally flat land about 3400 ft. southwest of San Francisco Bay (see Figure 1, p. 7) and about 13 to 15 ft. above the San Francisco Datum (which lies 8.6 ft. above mean sea level). Higher land is located to the northwest at Nob Hill, to the north at Telegraph Hill, and to the southeast at Rincon Hill.

GEOLOGY

The site is located over the ancient Yerba Buena Canyon, which underlies the downtown area with its centerline almost directly beneath Mission St. The canyon was eroded in Franciscan bedrock during the Pleistocene Epoch (ten thousand to two million years ago) and subsequently filled with marine and alluvial deposits. Sea level fluctuation during the canyon filling has

III. Environmental Setting

resulted in interlayering of marine deposits with fresh-water and wind-blown deposits. More recently, man-made fill consisting of sand and debris has been placed on top of the natural fill. Probable arrangement of the sediments is shown in Appendix E, p. 131.

Man-made fill deposits are not suitable for a foundation base because of their tendency towards densification under earthquake shaking. All large buildings in the locality are supported by piles, driven into the dense clay and sand layers, which are capable of bearing heavy loads.

SEISMOLOGY

No active faults^{/2/} are known to be located within San Francisco; however several affect it. These include the San Andreas Fault, approximately nine miles southwest of the site; the Hayward Fault, about ten miles east of the site; and the Calaveras Fault, about 30 miles east of the site. All of these faults have a recent history of major and minor movements; large earthquakes can be expected in this region in the future. Within approximately the next 125 years (estimates of the recurrence interval vary)^{/3/} at least one severe earthquake of the magnitude of the 1906 San Francisco earthquake (about 8.3 on the Richter magnitude scale, a logarithmic scale measuring earthquake magnitude on the basis of energy released), and several moderate earthquakes comparable to the 1957 Daly City earthquake (Richter 5.3) can be expected to affect the proposed structure.

Potential seismic hazards include "strong" ground shaking, causing cracks in masonry and brick work, and subsidence of fill material.^{/3/} No liquefaction,^{/4/} compaction, or internal disintegration of the natural soils is expected; the project area will not be affected by either the 100- or 500-year tsunami runups.^{/5/}

HYDROLOGY

No water bodies, springs, or water courses are located on or near the project site. The site is a relatively low-lying area which, under natural conditions, would receive runoff from areas to the north and west. Surface

III. Environmental Setting

runoff is nearly 100% because of the impervious nature of the site. It is discharged into a combined sanitary sewer and storm drain system which is designed to handle the 5-yr. storm./6/ Runoff from large storms is carried through the streets. In addition, due to insufficient sewage treatment capacity at the North Point Water Pollution Control Plant, stormwater runoff causes an average of 80 overflows of wastewater per year into the Bay. Improvements to the wastewater system to reduce overflows for the area of eastern San Francisco, bounded by Jackson St. on the north and Islais Creek on the south, to a maximum of ten per year are currently under design and construction./7/

The groundwater table near the site is at about elevation -2 feet San Francisco City Datum, which corresponds to about 15 to 17 ft. below the ground surface.

NOTES - Geology, Seismology, and Hydrology

/1/ This section is based in large part on data provided by the project geotechnical consultant in: Lee and Praszker, Geotechnical and Foundation Engineers, 1982, Preliminary Geotechnical Investigation, Proposed New Montgomery Street Office Building, San Francisco, California

/2/ Active faults are those having an historic record of activity or showing other geophysical evidence of movement within approximately the last 10,000 years.

/3/ Jim Dietrich, Earthquake Prediction Program Director, U.S. Geological Survey, telephone conversation, May 3, 1982.

/4/ Liquefaction is the transformation of granular material, such as loose wet sand, into a fluid state, such as quicksand.

/5/ Garcia, A.W. and J.R. Houston, 1975, Type 16 Flood Insurance Study: Tsunami Predictions for Monterey and San Francisco Bays and Puget Sound, Technical Report H-75-17, Hydraulics Laboratory, U.S. Army Engineer Waterways Experiments Station, P.O. Box 631, Vicksburg, Mississippi 39180.

/6/ The 5-year storm is the maximum storm which would be expected to occur in a particular area about once in five years. More specifically, it has a 20% probability of occurring once in any given year; it may occur several times in one year and not again for another 10 to 15 years.

/7/ Don Hayashi, Director, Citizen Participation, San Francisco Clean Water Program, telephone conversation, April 13, 1982.

IV. ENVIRONMENTAL IMPACT

The Initial Study for this project, which was published on January 29, 1982, identified environmental effects of the project which would be either insignificant or mitigated through measures included in the project design (see Appendix H, p. 201). These are summarized below and not discussed further in this EIR.

POTENTIAL ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

Land Use Compatibility: The project would be consistent with land uses in the vicinity of the site and in the C-3-0 district. The project would provide 14 floors of office space with retail uses on the ground level. Most of the surrounding land uses on New Montgomery St. are office with some retail; uses along Mission St. are primarily retail.

Noise: After completion, project operation would not perceptibly increase noise levels in the project vicinity. Operational noise would be regulated by the San Francisco Noise Ordinance and noise insulation measures contained in the Noise Guidelines of the San Francisco Comprehensive Plan.

Construction Effects on Air Quality: Construction activities would not increase the frequency of violations of air quality standards. Mitigation measures would reduce temporary particulate emissions during construction.

Wind: The project does not appear to have the potential to create ground-level wind impacts which would cause pedestrian discomfort. Aldrich Alley is so narrow that aerodynamically, with northwest winds, the Call Building and the project would act as one structure, and wind accelerations would occur above ground level along the narrow eastern and western faces of the building. Pedestrian areas adjacent to the building along Mission St. would experience generally lighter winds due to the shelter offered by the building.

Utilities and Public Services: Increased demand for public services and utilities attributable to the project would not require additional personnel or equipment.

Biology: The project would have no direct effect on plant or animal life as the site is totally occupied by a structure.

Hazards: Project operation would not increase the risk of explosion or release of hazardous substances, in the event of an accident, or cause other dangers to public health and safety.

Other issues required by the California Environmental Quality Act to be included in an EIR are discussed below.

A. URBAN DESIGN FACTORS AND SHADOWS

The proposed project is a 15-story, 240-ft. high office building. The structure would be rectilinear in form with a 1:1 pitch roof that would include glass dormers on the east and west sides of the structure. It would be built out to the property line along Mission St. and set back from the property lines along Aldrich Alley and New Montgomery St. (see Figure 7, p. 15). The building facade would consist of a balanced composition of horizontal and vertical elements. Surface materials would consist of modular metal panels which are intended to give scale to the building facades. Grey-tinted glass would be used above the second level, with clear glass at the first and second levels. Window glazing would repeat the modular effect of the metal panels. The color of the exterior materials would be selected to be compatible with the neighboring buildings.

The main entrance to the building lobby would be on New Montgomery St. (see Figure 4, p. 11), with a side service entrance located on Aldrich (the north side of the building). Access to the ground floor retail spaces would be provided by an entrance on Mission St. A bicycle rack would be installed near the Mission St. entrance.

COMPATIBILITY WITH THE URBAN DESIGN ELEMENT OF THE COMPREHENSIVE PLAN

The Urban Design Element of the San Francisco Comprehensive Plan provides a basis in City policy for the following summary of the urban design implications of the proposed project (see Table 2).

● TABLE 2: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE SAN FRANCISCO COMPREHENSIVE PLAN* AND THE PROPOSED PROJECT

APPLICABLE URBAN DESIGN POLICIES

A. Policies for City Pattern

1. Policy 3 - "Recognize that buildings, when seen together, produce a total effect that characterizes the City and its districts." (p. 10)

RELATIONSHIP OF PROJECT TO APPLICABLE POLICIES

The project would join a number of other comparably sized relatively recent highrise buildings in the downtown area. Collectively, these buildings provide the major visual identification for the central business district. The project would be visible in views of the skyline from the south, and together with other south of Market St. highrise structures, would define the southern edge of the Financial District (see Item C-3, p. 32 and Figure 10, p. 33).

B. Policies for Conservation

2. Policy 6 - "Respect the character of older development nearby in the design of new buildings." (p. 25)

The project would be higher than adjacent buildings but in other respects would be similar in scale (see Figure 11, p. 34). Its facade would be of precast concrete with a heavy aggregate, appearing similar to older neighbors. Its corner windows would be recessed eight to twelve inches in a manner similar to the Call Building. Details on the project's base would relate to the street-level proportions of older buildings nearby. Horizontal cornice lines at the third level of the project would line up with the cornice of the adjacent Call Building. The recessed central entrance would repeat the central entrance design of the Call Building and other buildings on New Montgomery St.

TABLE 2: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE SAN FRANCISCO COMPREHENSIVE PLAN* AND THE PROPOSED PROJECT (Continued)

C. Policies for Major New Development

3. Policy 1 - "Promote harmony in the visual relationships and transitions between newer and older buildings." (p. 36)

See Items A-1 and B-2, p. 31. The project would provide a link between the 440-ft.-high Foremost McKesson Building at One Post St. (opposite the northern end of New Montgomery St.) and the 436-ft.-high Pacific Telephone Building at 140 New Montgomery St. (in the block south of the project site), as shown in Figures 12 and 12A, p. 35 and 35a. The sloped roof would be similar to the roofs of such nearby buildings as the Hobart Building at 582 Market St., the Citizens Savings Building at 704 Market St., and the Hunter-Dulin Building at 111 Sutter St.

4. Policy 2 - "Avoid extreme contrast in color, shape, and other characteristics which will cause buildings to stand out in excess of their public importance." (p. 36)

The project would be light in color in keeping with adjacent buildings. The rectilinear shape of the building would be similar to the shapes of nearby older development, although the building would be taller than the adjacent Call Building. The sloped roof would be similar to several nearby older buildings (see Item C-3 above and Figure 10, p. 33). The building facade would consist of precast concrete panels which would provide a surface texture compatible with adjacent buildings.

5. Policy 5 - "Relate the heights of buildings to important attributes of the City pattern and to the height and character of existing development." (p. 36)

See Items A-1 and C-3 above. The project would be taller than neighboring low-rise and mid-rise development. At 240 ft., the project would be the tallest building on New Montgomery St. between the 436-ft. Pacific Telephone Building and the 440-ft. Foremost McKesson Building.

6. Policy 6 - "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." (p. 37)

See Items A-1 and B-2, p. 31, and C-3, p. 32. The bulk of the project would be similar in scale to the prevailing scale of existing development nearby.

*Department of City Planning, 1971, Urban Design Element of the Comprehensive (Master) Plan. Page references to the Plan are shown in parentheses.

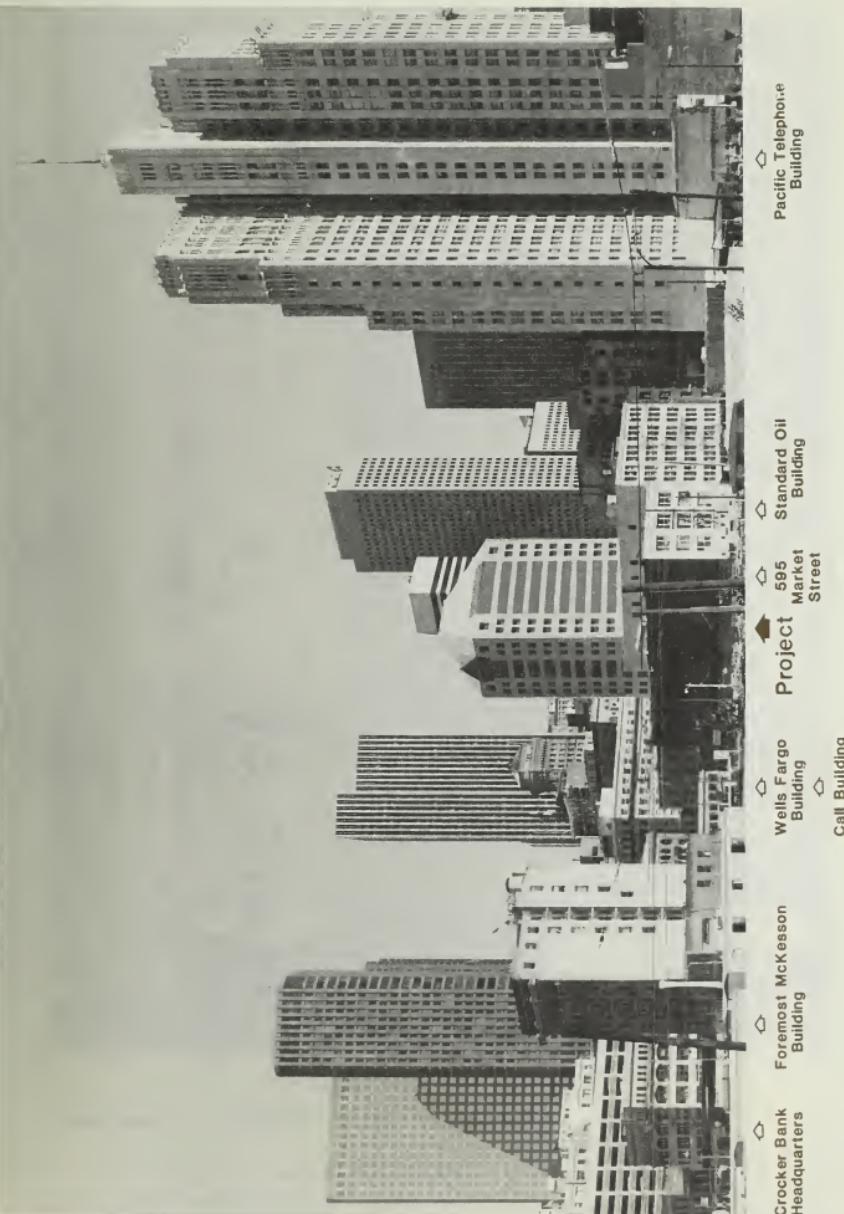


FIGURE 10: Outline of Proposed Project Looking Northeast from Moscone Center on Howard Street between Third and Fourth Streets

SOURCE: Gurcler and Associates



FIGURE 11: View of Project
Looking North on
New Montgomery Street

SOURCE: Environmental Science
Associates, Inc.

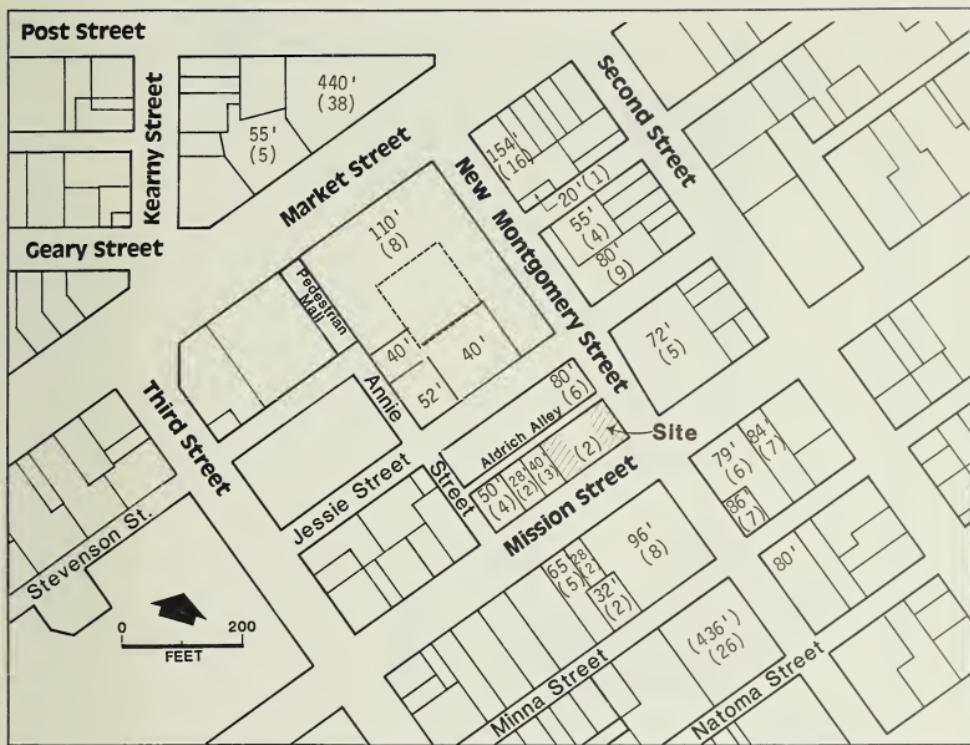
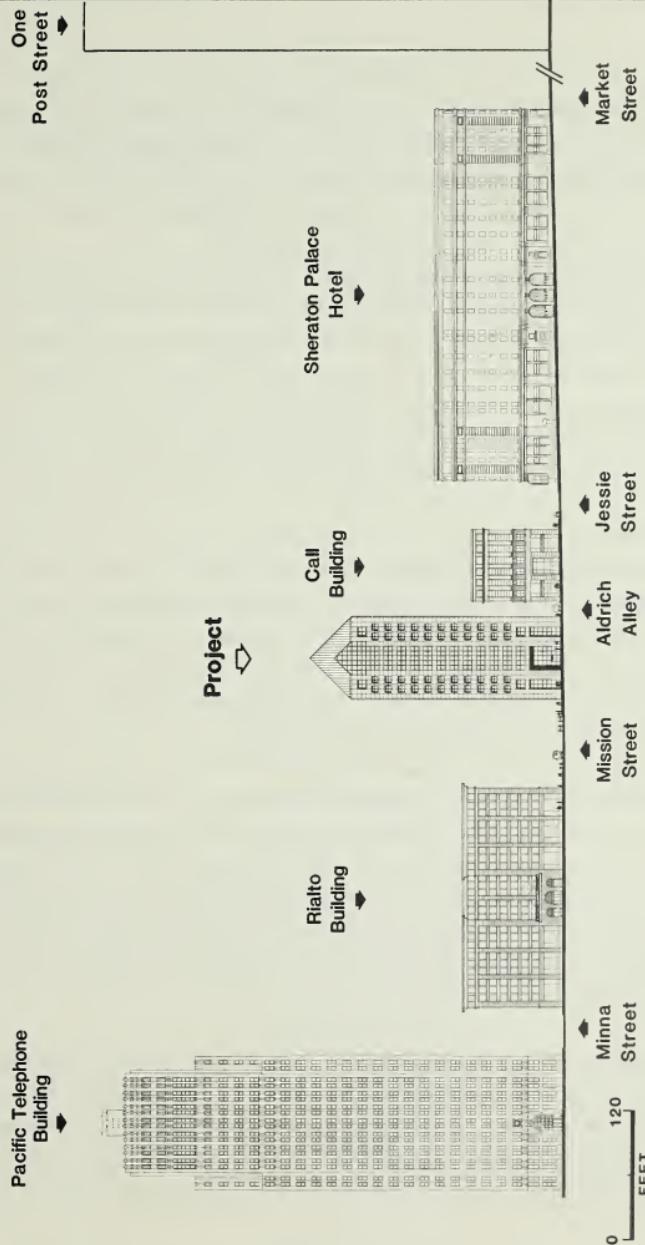


FIGURE 12: Building Heights Near the Project Site

SOURCE: Environmental Science Associates, Inc.



● FIGURE 12A: New Montgomery Street Frontage

SOURCE: Gensler and Associates

SHADOWS

The project would increase the amount of shadow cast on the buildings northwest of the project site (the Call building and the Sheraton Palace Hotel) and on New Montgomery St. Pages 38 through 50 show the extent of new shadow cast by the project in comparison with existing shadow in the project area. The months of the year selected for shadow analysis are September through March, beginning and ending with dates which correspond to the spring and fall equinox, respectively, when day and night are of equal length; the analysis includes December, when days are the shortest and shadows are longest. The months of April through August (including June which represents the longest period of daylight, when shadows are the shortest of the year) were not included in the analysis because shadows cast by the project during these months do not affect the Garden Court of the Sheraton Palace Hotel.

The Garden Court has a roof of translucent glass which allows diffused and reflected sunlight to illuminate the area; in addition, the chandeliers in the court interior provide illumination. The effect of shadowing is not as severe as it would be if interior illumination (and warmth) depended on direct sunlighting to the court. It is likely that total interior illumination in the Garden Court would be greater on a sunny day with almost total shadows, than it would be on an overcast or foggy day.

- During early morning hours, the Garden Court is partially shaded by the east wing of the Sheraton Palace Hotel for most of the year, and partially shaded by the Call Building from November 22nd to January 21st, when shadows are longest. The project would cast new shadows on the roof of the Garden Court from late September to late March during mid-morning hours. New shadows cast by the project would advance and recede, lasting from about ten minutes to a maximum of about two and one-half hours.

On September 24th and March 21st, the Garden Court would be shadowed by the hotel itself at 7:30 a.m. New shadows would be cast between about 8 a.m. and 9 a.m. (9 a.m. and 10 a.m. Daylight Savings Time (DST)) with maximum extent of the new shadows covering about 25% of the Garden Court roof at 8:30 a.m. (9:30 a.m. DST) (see Figures 13a and 13b, pp. 38 and 39). At the same time,

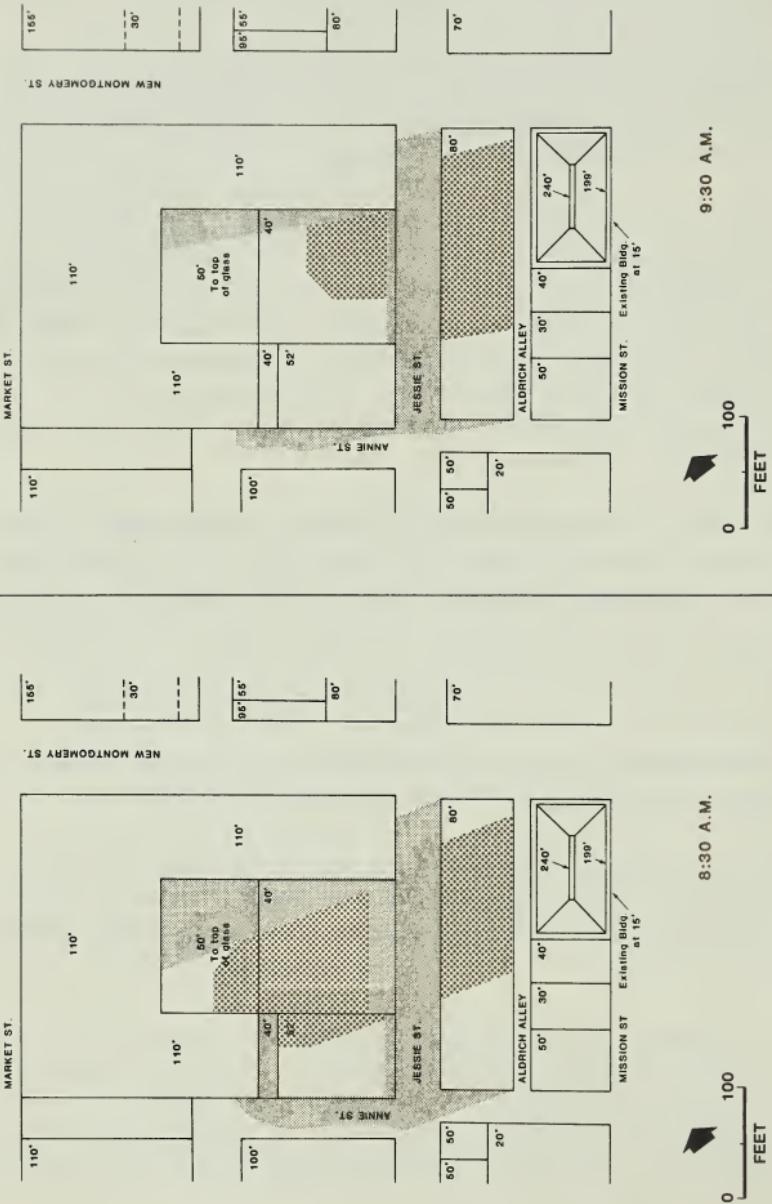
IV. Environmental Impact

the hotel itself would be shading about 60% of the Garden Court roof. On October 6th and March 8th (see Figures 14a and 14b, pp. 40 and 41), new shadows would be cast between 7 a.m. and 9:30 a.m. (8 a.m. and 10:30 a.m. DST) with maximum extent of the new shadows covering about 50% of the Garden Court roof at 8:15 a.m. (9:15 a.m. DST) (see Figure 14a). The hotel itself would be shading the other half of the roof.

Maximum shading from the project on the Garden Court roof would occur from late October to late November in the fall and from late January to late February in the winter. New shadows would last from about 7:30 a.m. to about 10 a.m. (see Figures 15, 16, and 17, pp. 42 - 47). The hotel and the Call Building shade 100% of the glass roof at 7:00 a.m. The project shadow would advance and shade a maximum of about 70% at 8:45 a.m. on October 20th and February 23rd with the hotel itself shading about 25% (see Figure 15a, p. 42), and receding to less than 10% by 9:45 a.m. (see Figure 15b, p. 43).

On December 22nd at 8 a.m., the Garden Court would be in total shadow cast by the Call Building and the hotel itself (see Figure 18a, p. 48). The proposed project would thus add no new shadow at that time. The project would cast new shadows on the roof for about one hour, shading a maximum of 50% of the Garden Court at 8:30 a.m. and receding off the roof by about 9:30 a.m. By 10 a.m. the shadow would have moved in a northeasterly direction shading fewer buildings and more street area (see Figure 18b, p. 49). By 11 a.m. the project would shade the east side of New Montgomery St. and some building facades fronting that side of the street (see Figure 18c, p. 50).

From April through August, the project would cast no shadow on the Garden Court and would shade only a portion of the lower level of the hotel, the eastern half of the Call Building, and a portion of New Montgomery St. between Jessie and Mission Sts.



Project Shadow (new shadow only)
Existing Shadow

SOURCE: Environmental Science Associates, Inc.

FIGURE 13a: Shadow Patterns:
September 24/March 21,
8:30 & 9:30 A.M.

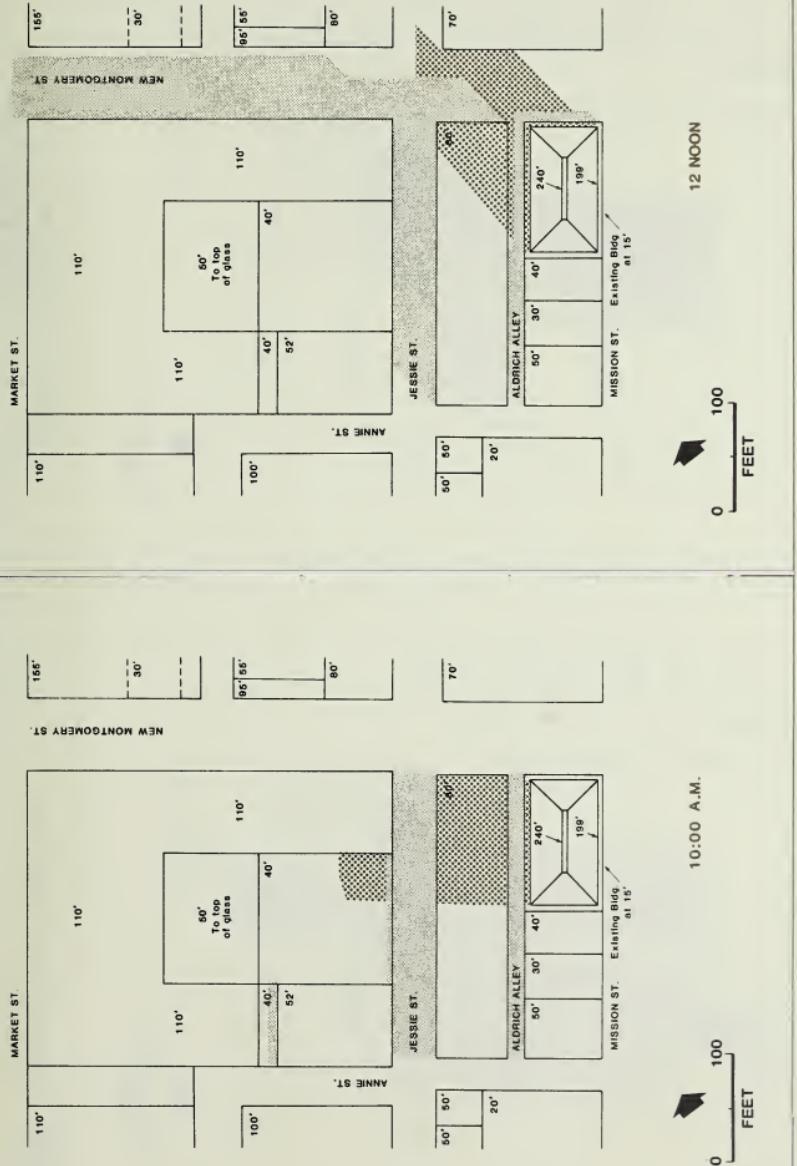


FIGURE 13b: Shadow Patterns:
September 24/March 21,
10 A.M. & 12 Noon

SOURCE: Environmental Science Associates, Inc.

Project Shadow (new shadow only)

Existing Shadow

A vertical strip of a map showing a north arrow pointing up and a scale bar from 0 to 100 feet.

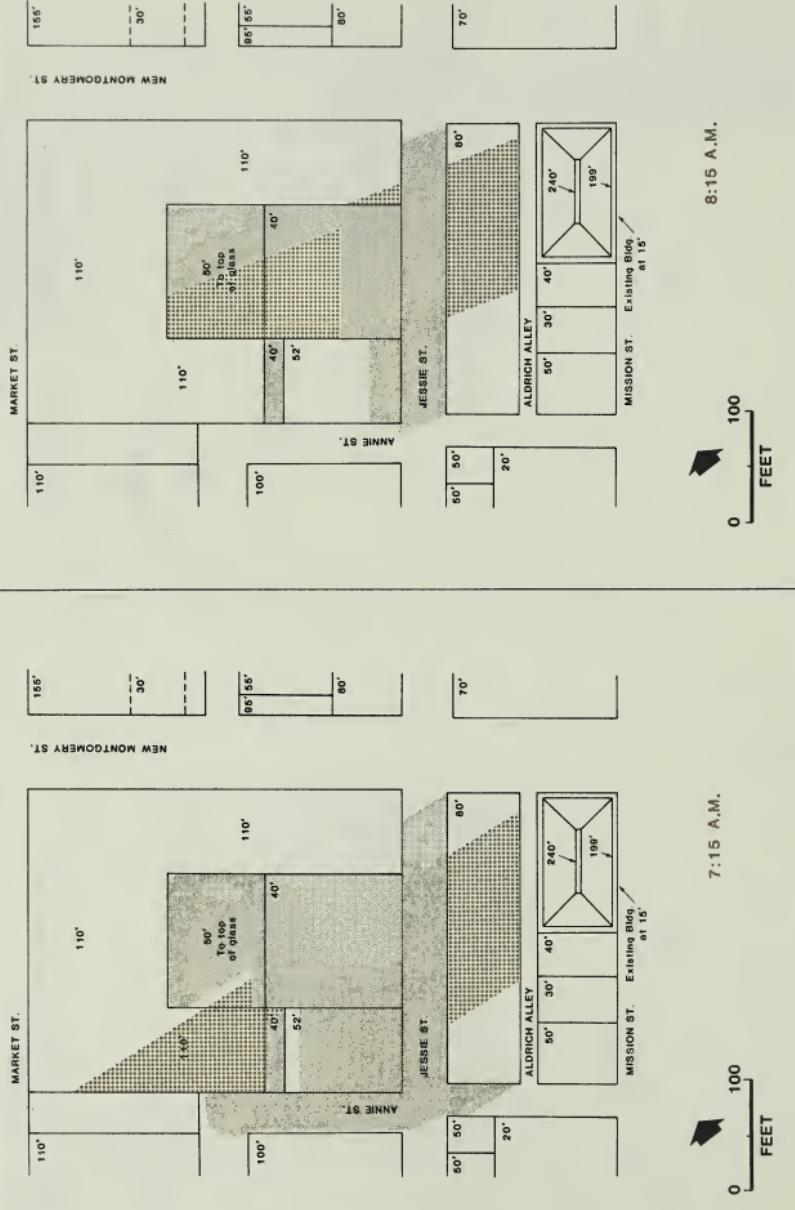


FIGURE 14a: Shadow Patterns:
October 6/March 8,
7:15 & 8:15 A.M.

Project Shadow (new shadow only)
Existing Shadow

SOURCE: Environmental Science Associates, Inc.

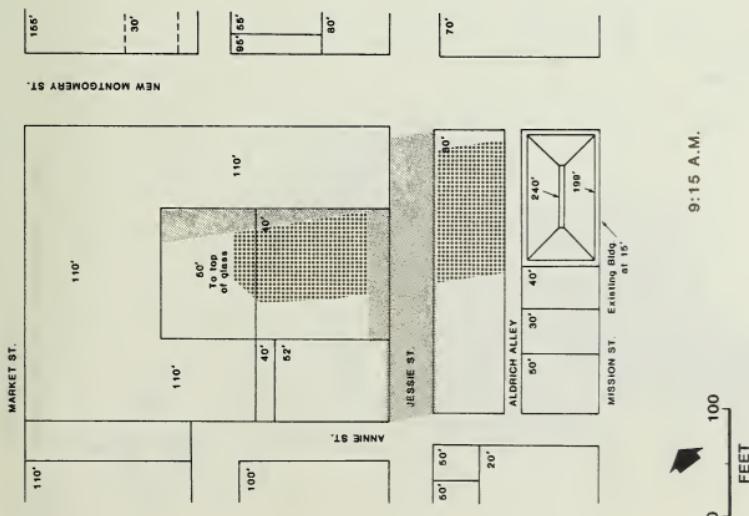


FIGURE 14b: Shadow Patterns: October 6/March 8, 9:15 A.M.

Project Shadow (new shadow only)

Existing Shadow

SOURCE: Environmental Science Associates, Inc.

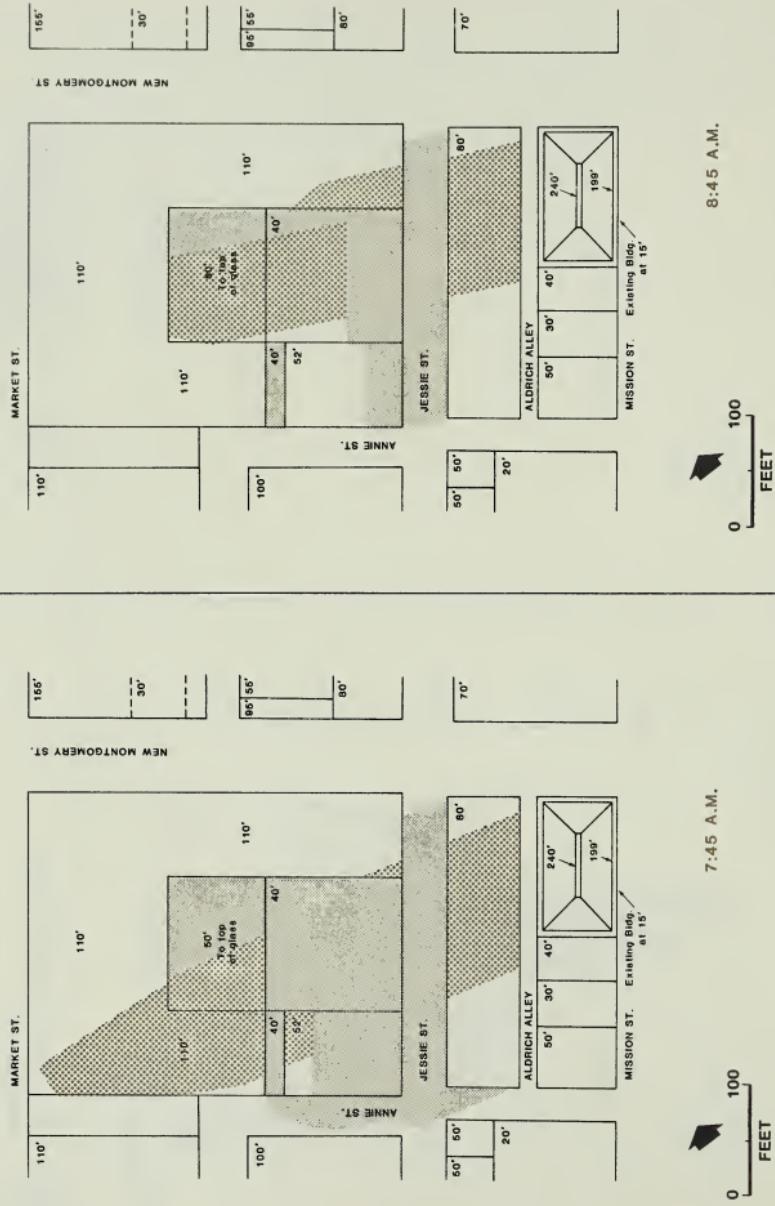


FIGURE 15a: Shadow Patterns:
October 20/February 23,
7:45 & 8:45 A.M.

Project Shadow (new shadow only)
Existing Shadow

SOURCE: Environmental Science Associates, Inc.

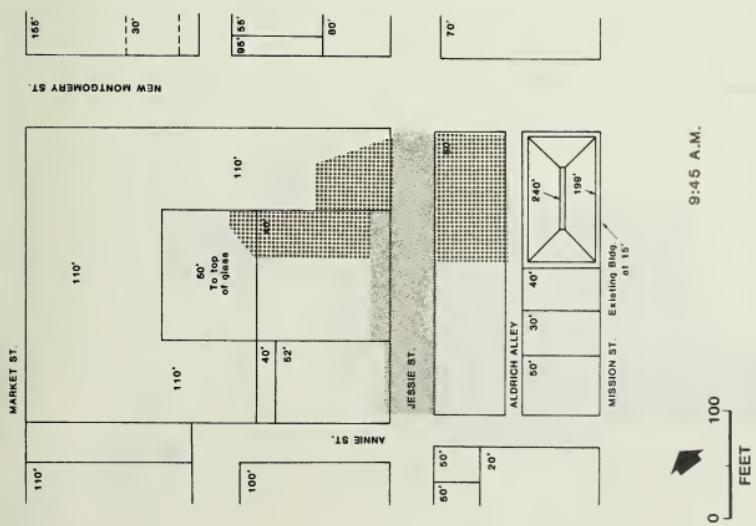
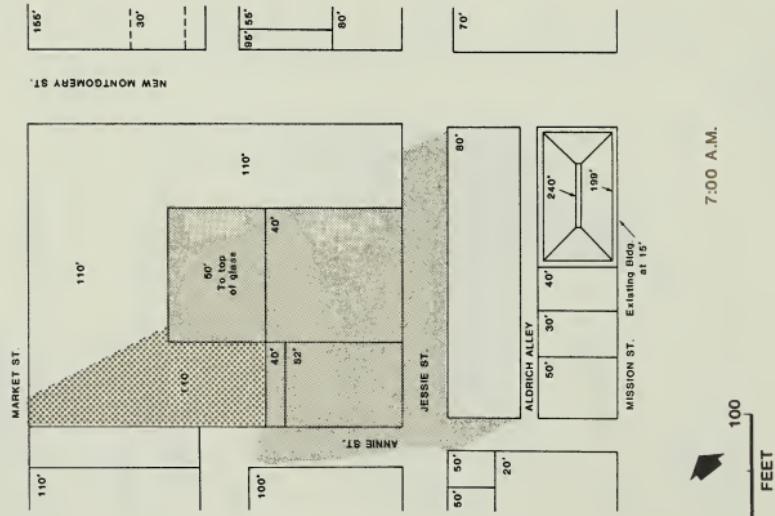
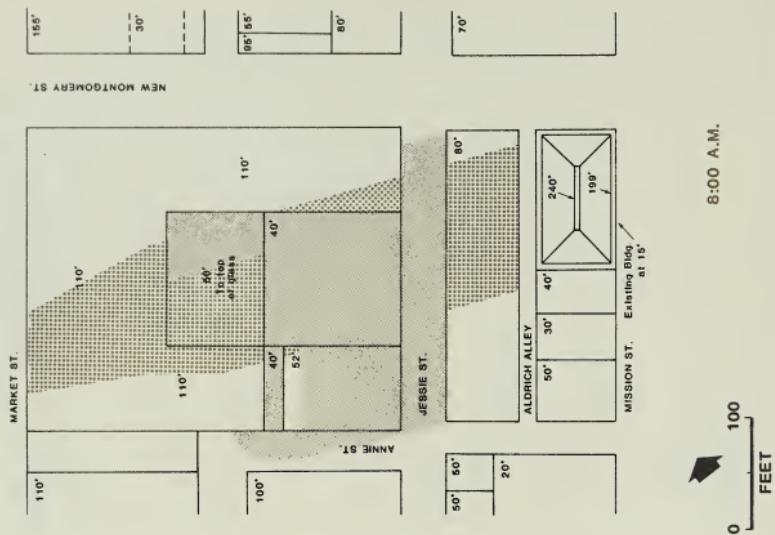


FIGURE 15b: Shadow Patterns: October 20/February 23, 9:45 A.M.

Project Shadow (new shadow only)

Existing Shadow

SOURCE: Environmental Science Associates, Inc.

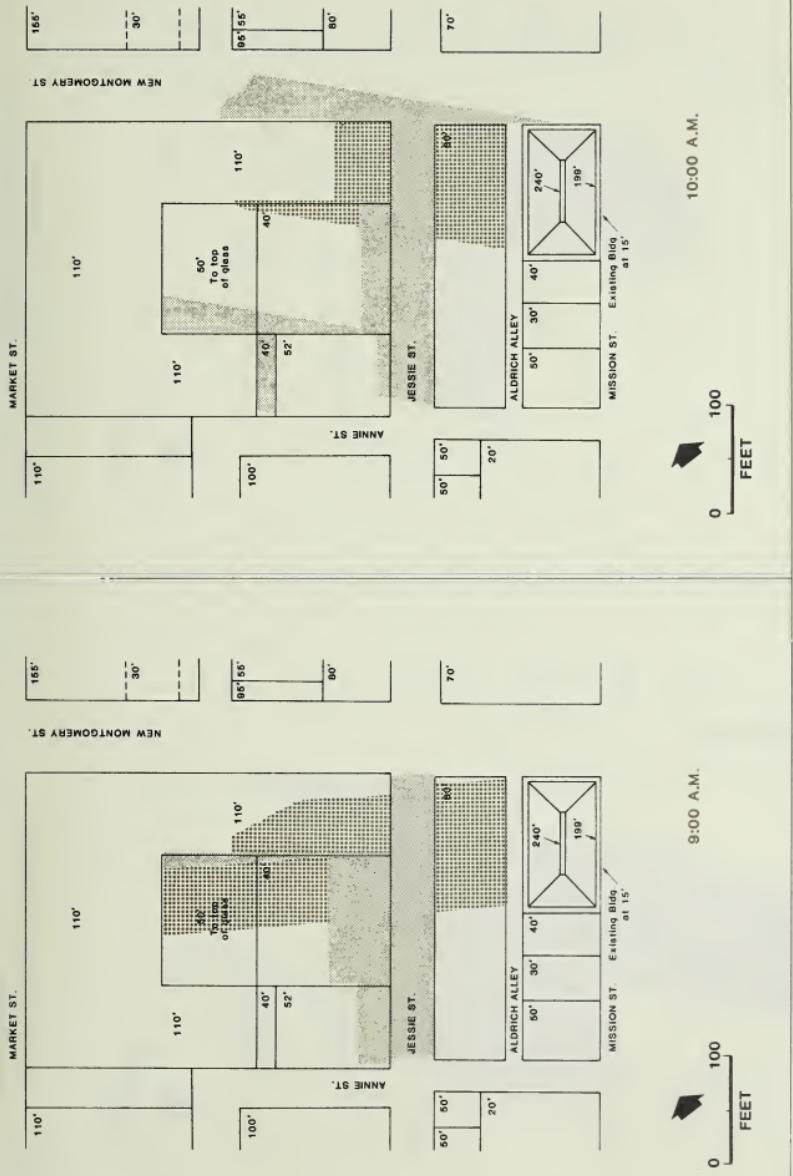


Project Shadow (new shadow only)
Existing Shadow

NEW MONTGOMERY ST.
MARKET ST.
JESSIE ST.
ALDRICH ALLEY
MISSION ST.
Existing Bldg.
el 15'

FIGURE 16a: Shadow Patterns:

November 4/February 8,
7 & 8 A.M.



Shadow Patterns:
November 4/February 8,
9 & 10 A.M.

Project Shadow (new shadow only)

Existing Shadow

SOURCE: Environmental Science Associates, Inc.

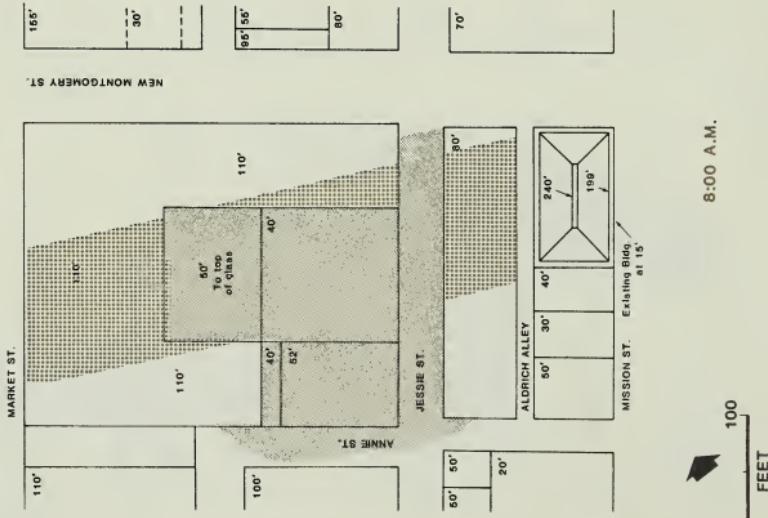
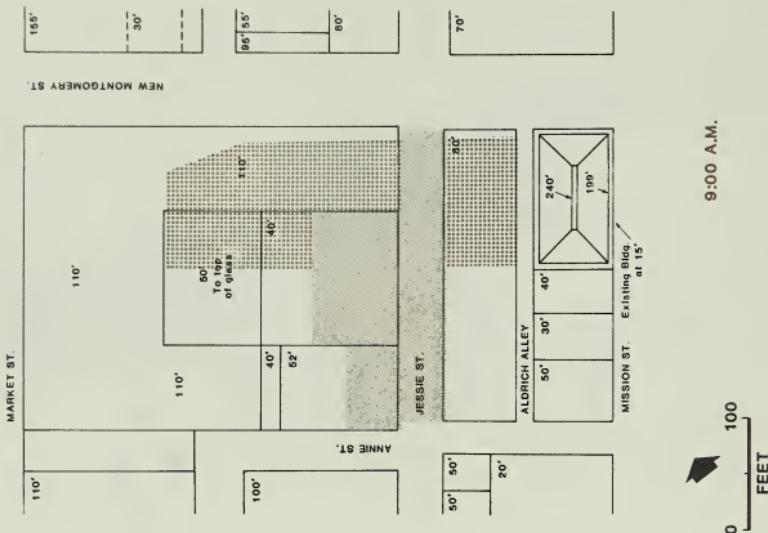


FIGURE 17a: Shadow Patterns:
November 22/January 21,
8 & 9 A.M.

Project Shadow (new shadow only)
Existing Shadow

SOURCE: Environmental Science Associates, Inc.

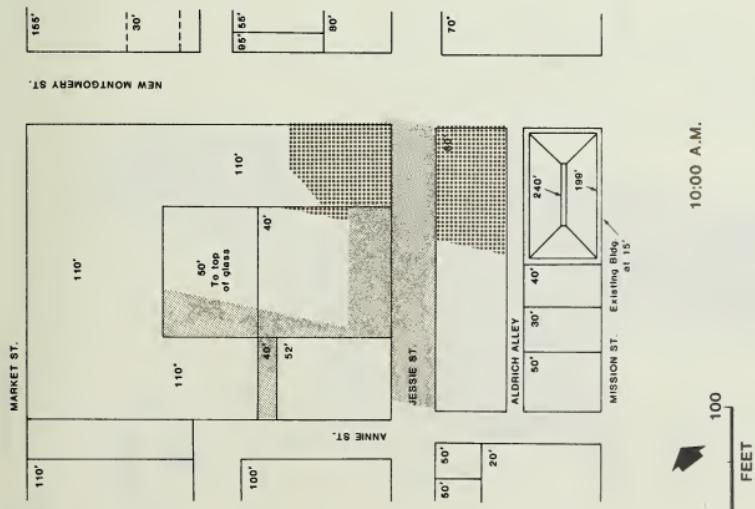


FIGURE 17b: Shadow Patterns: November 22/January 21, 10 A.M.

Project Shadow (new shadow only)

Existing Shadow

SOURCE: Environmental Science Associates, Inc.

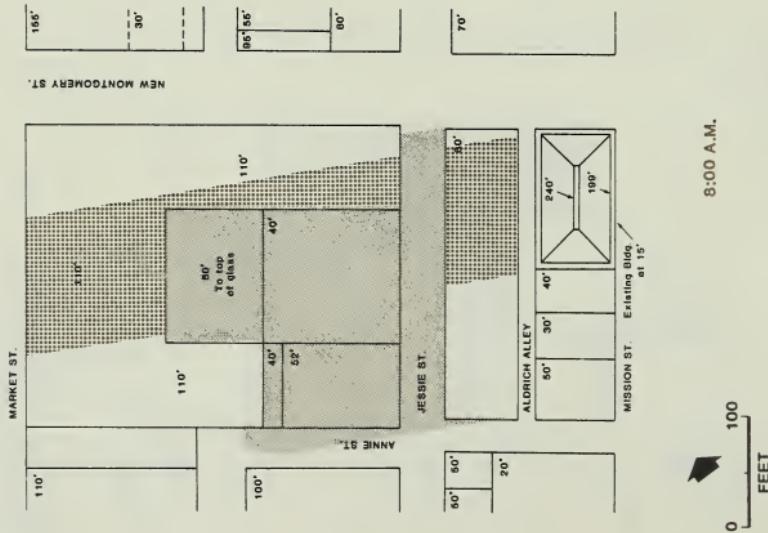


FIGURE 18a: Shadow Patterns: December 22, 8 AM

Project Shadow (new shadow only)
Existing Shadow

SOURCE: Environmental Science Associates, Inc.

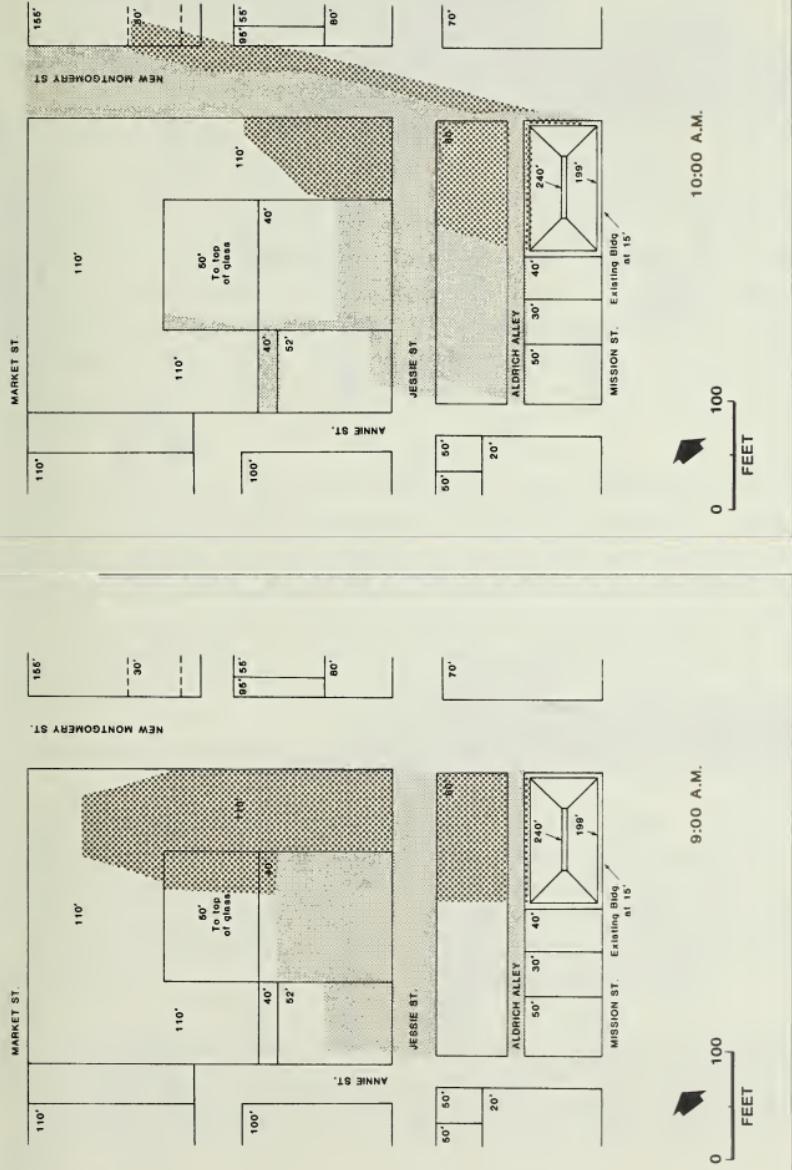


FIGURE 18b: Shadow Patterns: December 22, 9 & 10 A.M.

Project Shadow (new shadow only)

Existing Shadow

SOURCE: Environmental Science Associates, Inc.

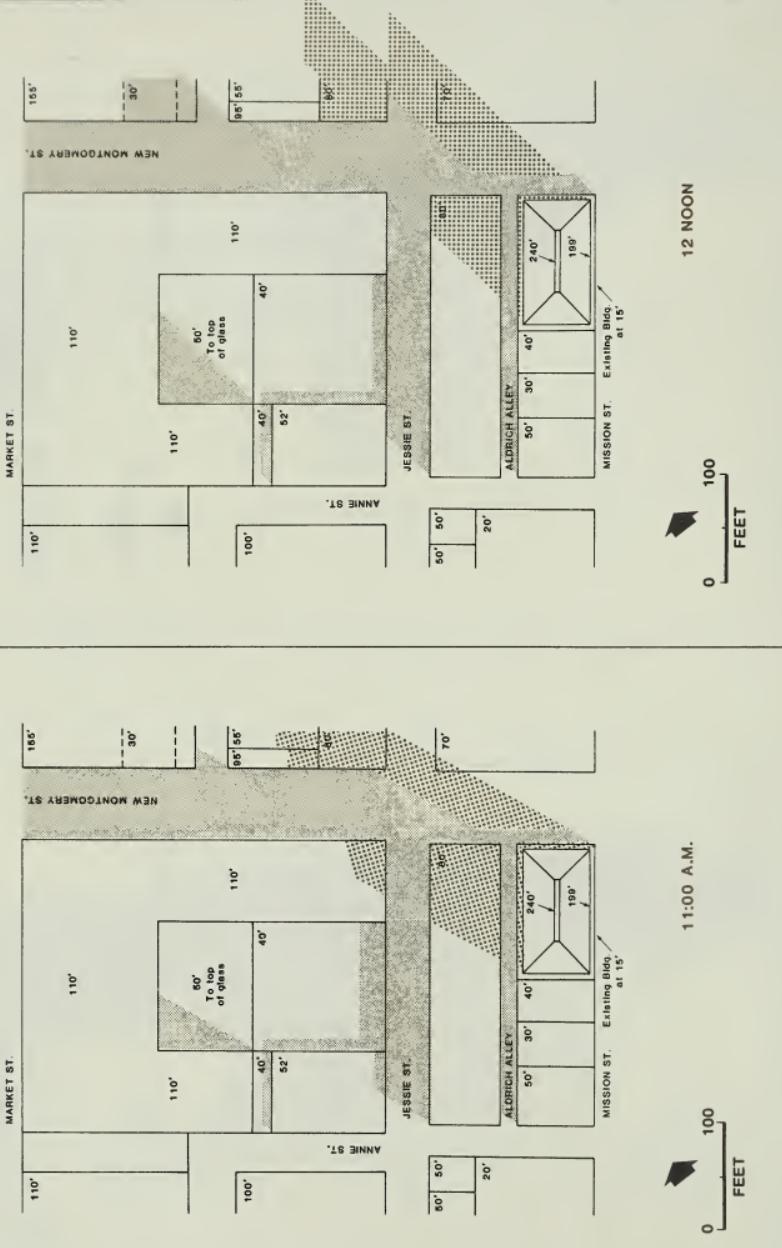


FIGURE 18c: Shadow Patterns:
December 22,
11 A.M. & 12 Noon

Project Shadow (new shadow only)

Existing Shadow

SOURCE: Environmental Science Associates, Inc.

B. EMPLOYMENT, HOUSING, AND FISCAL FACTORS**OFFICE SPACE IN SAN FRANCISCO**

- The proposed project would provide about 124,300 gross sq. ft. of new office space. The proposed project, together with other major downtown office buildings under construction and approved as of August 1982, would result in approximately 17.4 million gross sq. ft. of office space (see Appendix C, Table C-8, p. 195). Historically, low vacancy rates together with rising rents suggested that the supply of new office space was less than demand. The increasing availability of downtown office space in the near future may result in a higher office vacancy rate and may lower the recent rapid increase in office rents. These market conditions would be beneficial for future lessees of office space.

The growth of office space would continue the trend of regional growth in service sector and office headquarters activity and employment. Larger, newer buildings would be occupied primarily by tenants with many employees and those with the ability to pay higher rents. Because rent levels are lower for older buildings, space which is vacated by tenants relocating to newer buildings could become available for tenants who cannot afford higher rents for new office space./1/

PROJECT-RELATED EMPLOYMENT

The proposed project would result in demolition of the ground level and the second-floor level of the existing parking structure on the project site. The structure would be replaced by an office building with approximately 124,300 gross sq. ft. of office space. Ten jobs at the project site would be terminated or relocated. The future status of these employees has not been determined.

The proposed project would result in the creation of about 515 permanent jobs in 1984, the date of completion and occupancy. This would result in a net increase of 505 employees (includes all workers including business owners) on

IV. Environmental Impact

the project site. Because specific tenants of the office building are unknown at this time, the estimated number of employees was based on an average sq. ft. per employee for proposed uses as shown in Table 3.

TABLE 3: PROJECTED PERMANENT EMPLOYMENT AT THE PROJECT SITE

Employment Type	Building Space (Gross Sq. Ft.)	Space/Employee (Sq. Ft.)*	Projected Number of Employees**
Office	124,300	250	500
Retail	3,350	400	8
Building Maintenance	135,500	30,000	5
<u>TOTAL EMPLOYMENT</u>			515 (rounded)

* California Office of Planning and Research, January 1978, Economic Practices Manual, pp. 35-37.

** Rounded to nearest five.

SOURCE: Environmental Science Associates, Inc.

BAY AREA EMPLOYMENT MULTIPLIER EFFECTS AND CONSTRUCTION EMPLOYMENT

Secondary employment and income effects would result from permanent project employment because each employed person would generate additional employment by his or her demand for goods and services; this is called the multiplier effect. Assuming that jobs created as a result of the project were primarily in finance, insurance, and real estate industries, about 595 additional jobs in other sectors of the Bay Area economy would result./2/ Total Bay Area employment attributable to the project would be about 1,100 (505 net primary jobs plus 595 created by the multiplier). It is anticipated that many of the secondary jobs would be located in San Francisco.

The project would require about 85 person-years of construction labor, averaging about 55 full-time jobs throughout the 18-month construction period. About 130 additional person-years of employment would be generated in the Bay Area as a result of the multiplier effect of project construction./2/

HOUSING

As indicated in the previous subsection, the project would result in the generation of 515 full-time jobs, a net increase in downtown employment of approximately 505 jobs in 1984. To the extent that the project would attract out-of-area employees and contribute to the formation of additional households by existing area residents, it would also contribute to increasing local housing demand and a jobs/housing imbalance.

- Concerned with the impacts of cumulative office development on the San Francisco housing market, the Planning Commission has recently been requiring office developers to cause housing to be constructed in the City. Downtown office projects that are currently (as of August 6, 1982) under formal review, approved, and under construction and contain 50,000 sq. ft. or more of office space, total about 16.1 million gross sq. ft. of office space (see Appendix C, Table C-8). On the assumption that the housing formulas for new office development reflect the actual demand for housing in San Francisco [see Table B-2, note (a), p. 185], office development would result in the demand for about 6,900 to 14,300 households in San Francisco when all projects are fully occupied. This impact on the housing market would be mitigated to a certain extent because office developers have agreed to provide through City Planning Commission final approval resolutions, or have proposed on-site, about 3,800 housing units as of April, 1982. Of these, 1,984 units were explicitly called 'units' in the approval resolution, 250 were called 'credits,' 1,381 were called 'units to be provided in the manner and time provided for by OHPP Guidelines,' and 105 units are presently proposed on site as part of currently unapproved projects. The unmet housing demand resulting from cumulative office development would be for about 3,100 to 10,500 units. This figure would be reduced by projects that have been approved with a commitment to an unspecified number of housing units. (For further explanation, see the note on Table C-8, p. 195.)

The demand for 3,100 to 10,500 units in San Francisco that is assumed due to this office development, but not provided for through office developer-sponsored housing construction, would add to housing demand in San Francisco. Increasing demand could result in higher housing prices, higher rents, and lower vacancy rates.

Downtown office workers desiring to live in San Francisco who are unable to find housing in the City would be forced to seek housing in other Bay Area communities and pay higher commuting costs in dollars, in energy consumption, and in time. About 60% of office workers are not expected to seek housing in San Francisco and a portion of the 40% who desire to live in San Francisco may be unable to find housing here. This resulting demand for housing in other Bay Area communities attributable to downtown San Francisco office development may result in higher housing costs and lower vacancy rates in these other communities. It is not possible to predict how such factors would be affected in these other communities or where those people preferring to live in San Francisco would settle if they cannot settle in San Francisco. This demand, however, may stimulate the house construction industry and could benefit the building trades.

While cumulative office development is attracting more workers to the City and resulting in increased demand for housing, many other factors affect the housing market. The current slowdown in new housing construction is a national problem resulting from a variety of economic factors, including high construction costs and mortgage interest rates. The demand for housing in San Francisco may be partly attributable to immigration that is independent of downtown office development.

- Residency patterns for new employees that would be generated by the project are based on housing assumptions developed by the San Francisco Department of City Planning in the OHPP memorandum and by approximate residency patterns of downtown office employees surveyed for five other Downtown EIRs (see Appendix B, Table B-2, p. 185). It is assumed that about 40% of project employees are expected to seek residence in San Francisco, 18% on the Peninsula, 30% in the East Bay, and 12% in the North Bay. The City housing formula uses the following assumptions for the housing demand in San Francisco: office use generates one employee for each 250 sq. ft., 40% of all employees will desire to live in San Francisco and 1.8 working adults occupy each housing unit. According to the Department of City Planning housing formula, the proposed project would generate a demand for about 112 units of housing in San Francisco. Assuming that the split between owner- and renter-occupied housing would be the same for project workers as in the

IV. Environmental Impact

1980 U.S. Census for San Francisco, the distribution of new households generated directly by the project would be 37 owner-occupied (34%) and 73 renter-occupied (66%). The distribution of secondary households would be 13 owner-occupied (34%) and 24 renter-occupied (66%) households. Based on the assumptions documented in 101 Montgomery Street, Final EIR, that between 15% and 30% of new employees

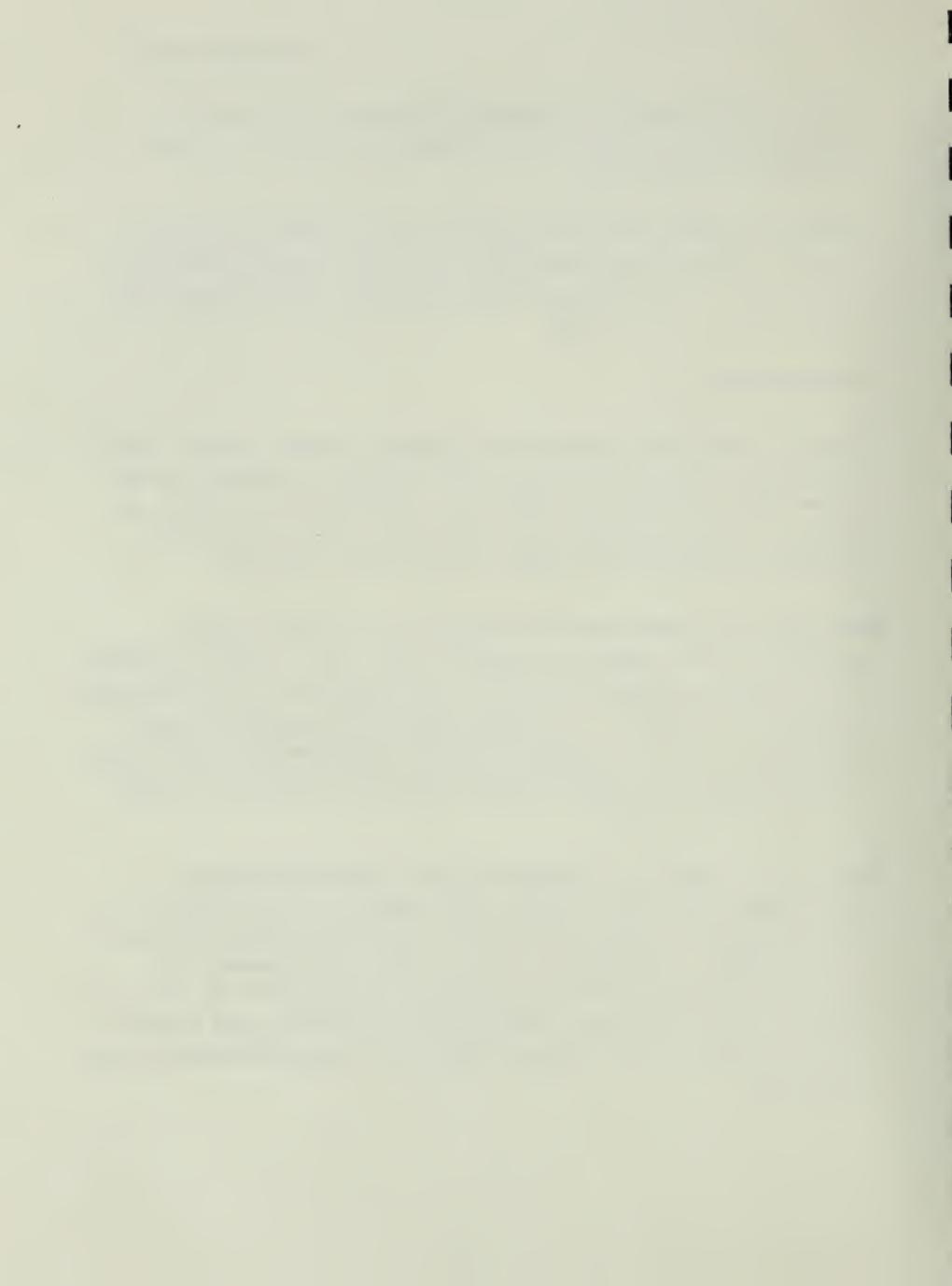
would be expected to move to San Francisco and each household would be occupied by 1.4 workers,^{5/} the project would result in 55 to 105 new households in San Francisco.

Based on 1.3 working adults per household,^{6/} the proposed project would generate a demand for approximately 70 housing units on the Peninsula, 115 housing units in the East Bay, and 45 housing units in the North Bay (see Appendix B, Table B-2, p. 185).

HOUSING AFFORDABILITY

Housing affordability is determined by a number of factors, usually in some combination, such as the number of potential buyers in a household and the income level of each, housing preferences, existing equity and savings and access to credit, and general housing market and economy considerations, including housing supply and quality, and the cost of financing.

- The extent of any additional housing demand resulting from secondary multipliers would be based on a regional economic model. However, a portion of the secondary employment would result from expenditures in San Francisco by employees of the project. It has been estimated that permanent downtown employees who live in San Francisco would each support an additional 0.6 jobs in San Francisco, while each non-resident permanent employee would support 0.13 jobs in the City.^{6a/}
- Under these assumptions, the proposed project would generate about 165 secondary jobs in San Francisco, which, under the City's formula for housing demand, would generate the need for about 35 additional housing units in the City.^{6a/} This estimate of about 35 housing units assumes that 40 percent of persons filling the secondary jobs would move to the City, as is assumed for office employees, although data to substantiate this assumption are not available. Not all persons filling these jobs would necessarily move to the City.



A survey of downtown office workers by the San Francisco Planning and Urban Renewal Association (SPUR) in 1974 provides information on salary ranges and estimates an average annual income level of \$16,300./7/ Given that the weekly earning of non-supervisory finance, insurance, and real estate sector workers increased about 67% nationwide between 1974 and December 1981,/8/ inflating the \$16,300 figure yields an average salary of about \$27,200 for downtown office workers. Although the SPUR data have been inflated to 1982 levels, there is no way to verify that the distribution of job classifications has remained the same since 1974, or whether salary levels have kept pace with or exceeded the rise in the nationwide Bureau of Labor Statistics Index.

More recent published information on office workers in the Bay Area indicates that the 1980 annual salary for support and clerical personnel ranged from about \$8,000 to \$29,000./9/ Wage information is not available for most professional occupational categories, with the exception of computer system analysts and drafters, who have mean annual salaries of \$25,740 and \$20,000, respectively;/9/ there is no known published data on income levels specifically for workers in San Francisco since the SPUR study. An October 1981 survey of 60% of the tenants at 601 Montgomery St. revealed that about

34% of the office workers are professionals with salaries ranging from \$21,000 to \$300,000 (average \$90,000); 36% are middle management personnel with salaries ranging from \$12,000 to \$70,000 (average \$45,000), and 30% are secretarial/support workers with salaries ranging from \$10,000 to \$35,000 (average \$19,200).^{10/} Tenants of the 601 Montgomery St. building are primarily law, insurance, and professional staff rather than clerical staff, thus contributing to the relatively high average salary (\$52,560) of this building's employees.

Without knowing the office tenants that would occupy the project, it is impossible to state with certainty the salaries of project employees. From the above information, annual salaries could range from about \$8,000 to \$300,000 and would probably average between \$25,000 and \$30,000. Consequently, this analysis for the project assumes an average salary of about \$27,200 for downtown office workers (the inflated SPUR data discussed above).

Financial institutions are currently allowing 35% of a buyer's gross monthly income for mortgage payments. Information from the San Francisco Board of Realtors shows that the average selling price of a home in the City in 1981 was \$151,200. The sales prices of homes sold in the week of October 1, 1981 ranged from \$95,000 to \$236,750.^{11/} At an interest rate of 15%, a 20% down payment and a loan term of 30 years, monthly payments of about \$1,500.00 would be required for a dwelling selling for \$151,000.^{12/}

The 1980 Census data for rental housing show that the median rent was \$266 in San Francisco and the vacancy rate was 2.7%. While the Census data reflect the entire rental stock, not all types of units would be available to new households. Stable households in the city may have occupied the same unit for many years. Lower-priced units probably are rented quickly and may not appear in newspaper advertisements. In certain instances, an apartment or dwelling unit would be shared by unrelated persons.

Based on the information provided above, it is concluded that most project workers would not be able to afford the median price of ownership housing in San Francisco, although a significant minority (perhaps one-third) would be able to do so. Based on the assumptions stated, almost all project employees

would be able to afford rental housing in San Francisco. These conclusions should be qualified because household circumstances vary. Housing affordability is determined not only by household income and price of housing, but also by the equity in existing real estate, savings, debt, access to credit, interest rates, number of dependents, number of wage earners in a household, tastes and preferences.

FISCAL EFFECTS

Revenues to the City

The project would have a fair market value of about \$19.3 million (in 1981 dollars).^{/13/} Property is now assessed at 100% of fair market value. Based on the property's full market value, the project would generate about \$229,000 in revenue to the City's General Fund at the Fiscal Year 1981-82 property tax rate of \$1.19 per one hundred dollars of market value. This would be a net increase of about \$219,000 over the property tax revenue generated by the site in 1981.

Currently, a payroll tax is paid on the earnings of ten employees at the project site. At a rate of 1.5% of total earnings, payroll tax revenues currently total about \$1,500 annually.^{/14/} Payroll taxes would be paid to the City General Fund on the earnings of approximately 400 of the 515 employees within the proposed office building. The remainder would be exempt from the tax either because they would work for banks or insurance companies, which are not required to pay San Francisco payroll taxes, because they would work for small, retail tenants with tax liabilities less than \$500, or because they would be owners of businesses, who are also exempt. Based on an average wage of \$27,200 for office workers in 1981, the payroll tax revenues from the project would be about \$165,000, a net increase of about \$163,500 above the 1981 revenues.^{/15/}

The average office worker in downtown San Francisco is estimated to make taxable expenditures of \$1,195 annually in the central business district.^{/16/} Sales tax revenues allocated to the City and County of San Francisco are 1.25% of taxable sales. Estimated sales tax revenues generated for the City

by project employees' expenditures would be about \$7,700. Sales tax revenue would also be generated by retail uses in the project; this amount cannot be determined until the types of businesses are identified. In addition, employees on the project site would generate about \$2,800 from the half-cent transit sales tax. Of that amount, \$2,100 would go to BART directly and the remaining \$700 would be distributed by the Metropolitan Transportation Commission to BART, Muni and AC Transit. Sales tax revenues generated by the existing employees on the project site are negligible.

Because the project site is currently occupied by a parking structure, the use (short- and long-term parking) generates a 15% San Francisco City parking tax. The 15% parking tax was enacted by Ordinance 286-70, Part 3, Article 9 of the Municipal Code. The tax is normally included in the parking fee. Information relating to gross receipts from the parking garage is held in confidence by the City and is therefore not available. An estimate of the 15% parking tax was based on a low and high range of gross receipts./17/ The annual parking tax for the low gross receipts would be about \$33,000; the annual parking tax for the high gross receipts would be about \$54,000. For the purpose of this report, the estimated annual parking tax was placed at a median value (between the high and low gross receipts) of about \$43,000.

It is estimated that the project would generate about \$14,500 in utility users' tax revenues to the City's General Fund./18/

On the assumptions that annual rent would be \$35 to \$50 per sq. ft. in 1984, and that the annual gross receipts tax rate remains 0.3%, the project would generate about \$13,500 to \$19,300 of tax revenues from annual rental income (assuming full occupancy)./19/

General Fund revenues for the City and County of San Francisco from the project would total about \$430,000, based on tax rates and fees in effect in early 1982. (Where ranges of revenue were estimated, the median value was used.) General Fund revenues from existing uses on the site totaled about \$55,000 in 1981; the project would result in about a \$375,000 net increase in General Fund revenues.

Revenues to Muni

The City's General Fund provides a subsidy to the Municipal Railway's operating budget that covers the difference between Muni's costs and the revenue Muni receives from fares and from federal and state sources. This subsidy represents the cost of Muni to the City. The average deficit per ride in 1981-82 is estimated by Muni at \$0.39./20/ On the assumption that about three of the employees who work on-site ride Muni to and from work, the existing General Fund subsidy to Muni required by commuting on-site employees is about \$550 per year./21, 22/ On the assumption that the 1981-82 subsidy would remain the same in 1984 and that 29% of the project employees would ride Muni to work, the project would create the need for a General Fund subsidy to Muni of about \$27,250 at 1981 costs, a net subsidy increase of about \$26,700./23/

The project would help pay for the Muni deficit through its revenue contributions to the General Fund. In the 1980-81 budget, ten percent of discretionary General Fund revenues were allocated to Muni. If this percentage were to remain constant, the project would generate about \$43,300 (in 1981 dollars) in the General Fund revenues to Muni in 1984.

On April 27, 1981, the San Francisco Board of Supervisors approved a proposal to assess new downtown commercial developments to help support Muni./24/ The program calls for levying a one-time fee of up to \$5.00 per gross sq. ft. on new downtown office space; however, this assessment fee is under litigation. If the assessment fee were to go into effect as proposed, the project would generate about \$621,500 for the one-time Muni fee. Other legislation would create a downtown assessment district in which all property owners would be assessed a yearly fee; this proposed ordinance providing for the annual assessment for Muni is currently being considered by the Board of Supervisors.

BART

BART fares cover about 40% of BART costs. For each BART passenger trip an average of \$1.00 is paid by fares, and an additional \$1.50 in costs must be supported by some other revenue source. Over 86% of this additional cost is supported by the special BART half-cent sales tax.

IV. Environmental Impact

On the assumption that the 1981 deficit per rider would be the same in 1985 and that 15% of the project employees would ride BART to work, the project would generate a deficit of about \$54,200 per year./25/ After subtraction of BART's revenues from sales and property taxes (about \$17,300) which would be generated by the project, BART's annual net deficit would be about \$36,900.

NOTES - Employment, Housing, and Fiscal Factors

/1/ Association of Bay Area Governments (ABAG), April 1981, Bay Area Office Growth, working papers on the Region's Economy, Number One.

/2/ Projections are based on the Bay Area Input-Output Model from Cooperative Extension Service, University of California, Berkeley, San Francisco Bay Area Input-Output Model 1967-1974, July 1978. A multiplier of 1.18 was used for permanent employment and 1.55 for construction employment.

/3/ San Francisco Department of City Planning, "Cumulative Housing Demand List," May, 1982. The list of projects included in the analysis is available for public review at the Office of Environmental Review, 450 McAllister St., 5th Floor, San Francisco, CA.

/4/
$$\frac{9.8 \text{ million gross sq. ft.} \times 40\% \text{ who would desire to live in San Francisco}}{250 \text{ sq. ft. per employee}} \times \frac{1.8 \text{ workers per household}}{1.8 \text{ workers per household}}$$

= 8,700 households.

/5/ This estimate is derived by assuming, based on the SPUR study, that the workers who move will be roughly equally divided between married and single workers. For married workers, San Francisco workers per household were estimated based on the labor force participation rates of spouses of employed people and adjustments for unemployment and the distribution of employed San Francisco residents between jobs inside and outside San Francisco. For unmarried workers, it was assumed that half of them have another adult in their household. Using the labor force participation rates of single people, and making the same adjustments as in the case of spouses, an estimate of the number of San Francisco workers in unmarried households was derived (U.S. Department of Labor, Bureau of Labor Statistics, "Marital and Family Characteristics of the Labor Force, March 1979," Special Labor Force Report 237, January 1981; San Francisco Planning and Urban Renewal Association, Impact of Intensive High Rise Development on San Francisco, June 1975.)

/6/ Patricia Perry, Regional Planner, Association of Bay Area Governments (ABAG), telephone conversation, May 6, 1982. Based on estimates made from the preliminary census data (1980), the workers per household for the following counties were calculated:

<u>County</u>	<u>Workers per household</u>
Alameda	1.29
Marin	1.25
San Mateo	1.23

For the workers per household outside of San Francisco, 1.3 was used for this report.

- /6a/ Basis of calculation: San Francisco City Planning Commission, Bank of America Data Center FEIR, certified August 28, 1975, pp. 92-93. The current project would have 515 employees:

$$\begin{aligned}
 & 205 \text{ (40\%)} \text{ San Francisco residents, and } 310 \text{ non-residents.} \\
 & (205 \times 0.6) + (310 \times 0.13) = \text{about 165 secondary jobs in San Francisco.} \\
 & \underline{165 \times 40\%} = 37 \text{ housing units.} \\
 & \underline{1.8}
 \end{aligned}$$

/7/ San Francisco Planning and Urban Renewal Association (SPUR), June, 1975, Impact of Intensive High Rise Development in San Francisco, Detailed Findings.

/8/ Data are inflated by about 67%, the national average percentage increase in weekly earnings of nonsupervisory finance, insurance, and real estate employees between 1974 and the end of 1981 (U.S. Bureau of Labor Statistics, Monthly Labor Review, June 1975 and February 1982).

/9/ U.S. Department of Labor Statistics, "Area Wage Survey for the San Francisco-Oakland, CA Metropolitan Area," March 1981.

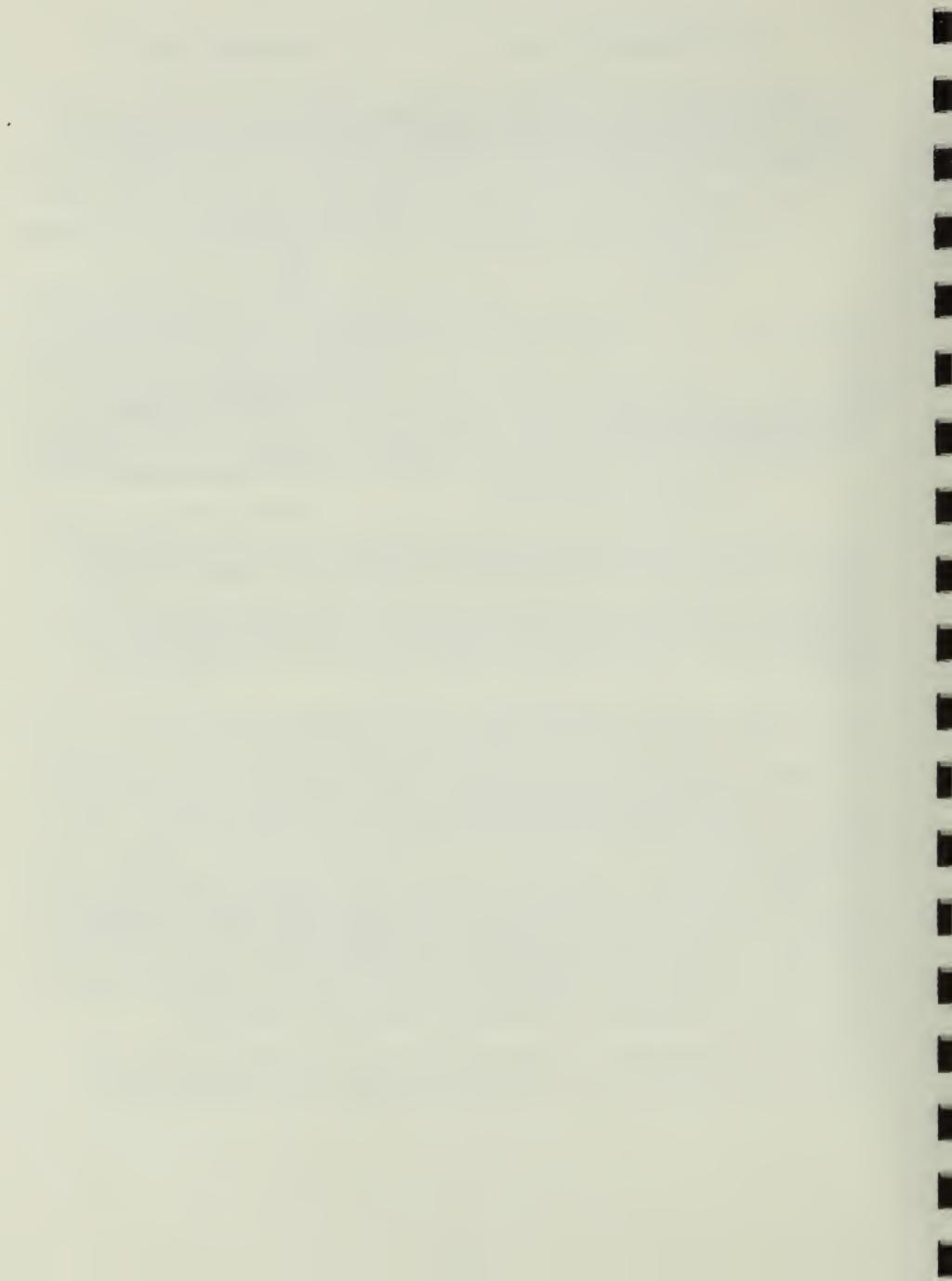
/10/ Montgomery/Washington Building FEIR, certified January 28, 1982, p. 75.

/11/ San Francisco Board of Realtors, October 5, 1981, "Multiple Sales Service." Annual data include all homes sold from February 11, 1981 to October 1, 1981.

/12/ These calculations assume that buyers are using conventional financing on a 30-year mortgage with 20% down payment at an 15% interest rate. It is noted that some buyers might borrow money to put down larger down payments or find loans with lower interest rates (such as owner-financing).

/13/ Based on a fair market value of about \$155 per sq. ft. as estimated for other proposed high-rise office buildings in downtown San Francisco.

/14/ On the assumption that the labor on-site is unskilled, the average annual wage for existing workers was estimated to be \$10,000 (about \$4.80 per hour).



IV. Environmental Impact

/15/ Downtown office workers earn an estimated \$27,200 annually in 1982, based on average annual earnings of \$16,300 for downtown office workers in 1974, in San Francisco Planning and Urban Renewal Association (SPUR), June 1975, Impact of Intensive High Rise Development in San Francisco, Detailed Findings. Data are inflated by about 67%, the national percentage increase in weekly earnings of finance, insurance and real estate employees between 1974 and the end of 1981 (U.S. Bureau of Labor Statistics, Monthly Labor Review, June 1975 and February 1982).

/16/ Taxable expenditures within the central business district per office worker were \$714 per year in 1974 (SPUR, 1975). Using the same proportion of taxable expenditure to annual income (based on an average salary of about \$27,200 in 1982), taxable expenditures per employee would be about \$1,195.

/17/ The parking garage has an estimated 100 parking spaces. The gross receipts from the parking garage are unknown; therefore, the parking tax (15%) was based on assumptions which used a low and high range of estimated gross receipts. Information was based on the following parking garage characteristics: the total weekly hours of garage operation are 84.5; the garage is open Monday through Saturday; charges are \$6.00 for an early bird special (in by 9:00 a.m., out by 6:30 p.m.); \$8.00 maximum for the day; \$1.00 per 20 minutes. An overall occupancy of about 70% was used; that is, of the 84.5 weekly hours that the garage is open, only 60 hours per week per space was assumed to be occupied.

The low revenue assumed that 50% of the parkers paid \$6.00 per day; the remaining 50% of the parkers paid \$8.00 per day. The calculations were as follows: $\$6.00 \times 50 \text{ parking spaces} \times 312 \text{ days (one year)} = \$93,600$;
 $\$8.00 \times 50 \text{ parking spaces} \times 312 \text{ days (one year)} = \$124,800$;
 Total = \$218,400.

Source: Environmental Science Associates, Inc.

The high revenue assumed that:

20% of the parkers paid \$1.00 per 20 minutes for 60 hours per week x 52 weeks = \$187,200;
 40% of the parkers paid \$6.00 per day x 312 days (one year) = \$74,800;
 40% of the parkers paid \$8.00 per day x 312 days (one year) = \$99,840;
 Total = \$361,840.

The parking tax for the low gross receipts would be \$32,760 (\$218,400 x 15%); that for the high gross receipts would be \$54,280 (\$361,840 x 15%).

Assumptions were based on a preliminary study by ESA on a parking structure located several blocks from the project site.

/18/ Utility users' annual tax revenues were calculated as follows, using 1982 utility rates averaged from past EIR data:

- (a) water: 802,125 cu. ft. x \$0.00414 per cu. ft. x \$0.05 tax rate = \$166.
- (b) gas: 28,000 therms per year x \$0.49 per therm x \$0.05 tax rate = \$686.
- (c) electricity: 1,690,480 kwh per year x \$0.0707 per kwh x \$0.05 tax rate = \$5,976.
- (d) telephone: 99,440 net sq. ft. x \$1.40 per sq. ft. x \$0.055 tax rate = \$7,657.

TOTAL UTILITY TAX REVENUES: \$14,485

Source: Environmental Science Associates, Inc.

/19/ Office and retail space: 128,900 gross sq. ft. An average rental rate between \$35 and \$50 for the year 1985 was used, based on projections from other proposed highrise office buildings in downtown San Francisco.

Assume annual rent of \$35 per sq. ft. (gross): 128,900 gross sq. ft. x \$35 = \$4,511,500 x \$0.003 (tax rate on rental income) = \$13,534.50.

Assume annual rent of \$50 per sq. ft. (gross): 128,900 gross sq. ft. x \$50 = \$6,445,000 x \$0.003 (tax rate on rental income) = \$19,335.

/20/ Bruce Bernard, Muni Chief Accountant, interview, October 28, 1981. Based on 1981-82 Muni net operating cost of \$142,139,000, and net revenues of \$87,833,000. On the assumption that the 1979 revenue passenger number of 139 million would be applicable in 1984, the average general fund deficit per ride would be \$0.39. There has been no update of the ridership number since 1979; therefore, the deficit per ride of \$0.39 is estimated.

/21/ Office of Environmental Review (OER), "Guidelines for Environmental Evaluation - Transportation Impacts," October, 1980.

/22/ Assuming 260 work days per year, two rides per day and absenteeism of ten percent (holiday, vacations, sick days), each worker will ride an estimated 468 times per year. Therefore, the cost is: 3 workers X 468 rides per year X \$0.39 deficit per ride = \$547, rounded to \$550.

/23/ 515 workers X 29% ride Muni X 468 rides per year X \$0.39 deficit per ride = \$27,259 total subsidy to Muni due to the project. \$27,259 - \$547 = \$26,712

a \$26,700 net increase in subsidy to Muni due to the project.

/24/ San Francisco Ordinance No. 224-81, approved by the Board of Supervisors on April 27, 1981.

/25/ 515 workers X 15% ride BART X 468 rides per year X \$1.50 cost per ride (deficit) = \$54,229.50.

C. TRANSPORTATION

TRIP GENERATION

Project office and retail space would generate about 2300 person-trips per day, 1900 from the office space and 400 from the retail space./1/ The existing garage accommodates about 100 parked cars, generating an estimated 500 person-trips daily. The net increase in daily person-trips to the project site would be 1800.

P.M. peak-hour travel generated by the office and retail space would total about 425 trips. Estimates of travel by mode based on the existing pattern of

travel in the downtown area would distribute about 155 of these peak-hour trips to the automobile (36%), 125 to Muni (29%), and the remaining 145 principally to other public transit lines (36%). Of the 155 peak-hour trips by automobile, 20 drivers would park on site; others would compete for public parking off site. However, by the proposed date of occupancy of the project (1984), there would be essentially no vacancies in public parking in the City. Drivers from the project who would find public parking spaces through competition would displace other users of public parking, who would then resort to public transit. The same result would follow the displacement of 100 cars now parked on the site daily. The net effect on automobile use in the City would therefore be a far smaller increase than the 150 person-trips by auto projected for the project. By this process, Muni could get approximately 90 additional peak-hour trips beyond the 125 directly generated by people from the project. Trips on other public transit modes would be increased by a similar margin.^{2/} See Appendix C, Table C-4, p. 189 for estimates of travel on other transit agencies.

CUMULATIVE IMPACTS

- Within a 2,000-ft. walking distance of the site are about 13 proposed office projects, ten approved office projects, and eight office projects under construction. In addition, several residential and hotel projects are proposed in the project vicinity. The Meridien Hotel is under construction one block west of the project site. The new office buildings would generate about 23,100 new p.m. peak-hour person trip ends, increasing patronage on Muni lines serving the area by about 5,900 riders. Peak-hour pedestrian trips in the area would be expected to increase roughly 30% (see Table C-6 of Appendix C, p. 191, for a list of developments in the area). These projections are included in the discussion of cumulative impact on Muni and in the conditions for pedestrians given below.
- A total of 17.4 million gross square feet of office space is proposed, approved or under construction in the City. Tables C-7 and C-8, in Appendix C, show the projects included in the cumulative analysis. Approximately 1.3 million gross square feet of existing office space would be replaced by the proposed development, resulting in about 16.1 million gross

square feet of net new office space. This growth would generate approximately 48,000 person trip ends during the week day p.m. peak hour. (This includes the 23,100 person trip ends from the buildings within 2,000 ft. of the project.) Based upon existing transportation patterns about 15,200 person trip ends would occur by automobile, about 12,000 would occur on Muni, and the remainder would occur on other transit agencies and on other modes (bicycle, walking, etc.). Assuming existing average automobile occupancy rates cumulative development would generate approximately 10,500 new peak hour vehicle trip ends. Because the present population of persons traveling by each mode can be expected to change in the future most of this City-wide peak hour increase might be expected to be accommodated by a shift from single-occupant automobile to public transit or ridesharing.

- In this and other San Francisco EIRs, a land-use type of approach has been used to estimate the transportation impacts of both the proposed project and cumulative development. An alternate type of approach is to forecast travel demand based upon regional projections of employment share (employment trend approach)./3/ Briefly, the fundamental differences between (and limitations of) the two approaches are:/3A/
- The land-use approach (as it has been applied in this EIR) has used net new office space actually proposed or under construction (less space in buildings demolished to make way for new buildings) as the basis for travel generation. The land-use approach assumes that literally all of the currently proposed development in the downtown area will be constructed and fully occupied within the time frame of the 90 New Montgomery Street project development and occupancy. No allowance has been made for less than 100 percent occupancy, for proposed developments that are never constructed, or for those which would not be occupied within the time frame of the 90 New Montgomery Street project.
- The employment trend approach generates a total increase in employment in downtown that has taken account of loss of employment as industries and offices move out of the City, replacement of one type of industry with another (industry shifts), as well as, replacement of existing office space with new office space. The employment trend approach makes no implicit assumptions concerning occupancy rates or actual square footage of development

constructed; rather, it generates total employment increases from a standpoint which assigns jobs by metropolitan sector (area) based upon extrapolation of past trends and which considers long-term industry shifts to, within, and away from each area.

- Note that neither of the two approaches has attempted to project future changes in modal split.
- To illustrate the differences in projections resulting from the two approaches, Table 3a, following, shows the total employment projections by the two methods (and the project's share thereof), the regional distribution of trips, and Muni's share of the new transit travel (and the project's share thereof).
- As shown in the table, the employment trend approach predicts about 15% fewer employees in the downtown and about eight percent more riders on the Muni than does the land-use approach. The employment trend approach would thus approximate the transit demand impacts discussed on pp. 65-68 of the EIR. Similar conclusions can be drawn for the other transit agencies.
- Several considerations concerning both of the methods need to be noted. The land-use approach, as it has been applied in San Francisco EIR's, analyzes impacts for the p.m. peak hour, whereas the employment trend approach analyzes the a.m. peak. Several reasons exist as to why one peak (or the other) may be the better one to analyze.
- First, the p.m. peak may be more useful to analyze, in that actual observation shows that the p.m. peak has a greater overall effect on the local street network and transit system in the downtown area than does the a.m. peak, as more travel takes place during the p.m. peak. Also, transit service is more inclined to differ from scheduled times during the p.m. peak than during the a.m. peak, as operational delays have had an 8- to 10-hour period over which to accumulate. Finally, the on-ramps to the freeway/bridge system are greater bottlenecks (in the p.m. peak) than are the off-ramps (in the a.m. peak).

- Conversely, the peaking characteristics of the a.m. peak may be more useful in that they are much sharper than those of the p.m. peak (i.e., a greater percentage of the peak-period travel occurs during a single hour). Also, as a result of the bridge system into San Francisco, travel inbound into the City is much easier to document, as tolls are collected on the inbound direction on the Golden Gate and Bay Bridges. Finally, a greater proportion of the travel occurring during the a.m. peak is employment-related; the p.m. peak includes shopping and pleasure trips which are not affected by increased office space.
- The land-use approach, as it has been used in this EIR, examines the p.m. peak because it has been observed to be the worst case for congestion on the City transportation system. This analysis does not reflect the spreading of the p.m. peak that is currently occurring, as all of the new trips have been assumed to take place in a single hour.
- While the land-use approach assumes all new office space is fully occupied, the assumption of a functional vacancy rate of 5 percent is not uncommon./3A/ With 16.1 million square feet of new office space assumed in the land-use approach to be occupied by 1990, a 5 percent vacancy would amount to approximately 805,000 square feet, representing 3,200 employees (at 250 square feet per employee), 600 of which would ride Muni in the p.m. peak hour. This adjustment for vacancy would thus reduce Muni peak-hour impacts in the cumulative analysis stated above by these 600 riders.
- The land-use approach calculations have assumed transit capacity to be fixed at existing levels. The OER memorandum/3A/ points out, 'It should be recognized that transportation is a more 'elastic' resource with many options for expansion including increasing existing capacity by using articulated vehicles, expanded car pool and van pool programs and increasing the peak commuter period through flex-time programs, among others.'
- If future office development does not occur along the lines of the past long-term trends, as assumed in the employment trend approach, then the projections made in Working Paper I would be revised. The average annual growth during the period 1965-1980 was less than the growth per year proposed, approved, or under construction for the period 1980-1984. The employment

● TABLE 3a: COMPARISONS OF LAND-USE AND EMPLOYMENT TREND APPROACHES

Approach	Downtown	Project Share*	Regional Trip Share				Muni Peak-hour Increase**	Project Share***
	Employment Increase		S.F.	Pen.	E.B.	N.B.		
Land Use	64,300	0.8%	49%	16%	24%	11%	12,000	1.0%
Empl. Trend+ (maximum)	56,100	0.9%	50-54%	19%	17-21%	10%	12,900++	1.0%

NOTE: As explained in the text, comparisons between the entries for the two approaches must be made with the understanding that the land-use approach reflects increases in employment and transit demand based solely upon increases in downtown office space, while the employment trend approach reflects total increases therein based upon historical trends. The differences among the regional trip share figures reflect these and the other differences between the two approaches.

*Employment generated by the proposed 90 New Montgomery Street project, as a percent of the cumulative downtown-employment increase.

**The Muni peak hour increase is a demand projection (based upon existing and long-term employment trends) that is not dependent upon available or expected transit capacity.

***Muni peak-hour trips generated by the proposed 90 New Montgomery Street project, as a percent of the cumulative downtown Muni peak-hour increase.

+These figures, represent the worst-case analysis under the employment trend approach reviewed and accepted by MTC, ABAG and Muni. Note that the land-use approach entries assume that an additional 16.1 million square feet of office space will come on line by late 1990.

++Based on 54 percent regional trip split to San Francisco (worst-case).

trend approach assumes average growth through 1990 would be at the lower historic rate, reflecting activity fluctuations from the current rate including slowdowns due to changing business conditions.

● Until a forecast exists to determine how the current decade's cycle of development may differ from the past, a judgment of the applicability of results from Working Paper I may not be made. Consequently, this EIR has retained the land-use approach and presented this comparison of the employment trend approach. Both methods should be looked upon as describing potential scenarios of future conditions.

PUBLIC TRANSIT

Muni

The total increase in peak-hour Muni patronage caused by the project would be about 215 persons, compared to about 30,000 riders on the 32 lines in the area (see Figure 19, p. 67). This 0.7% increase would be approximately equivalent to an average of 0.5 persons on each bus or cable car and one person on each Light Rail Vehicle (LRV). The effect of other development within a 2,000-ft. walking distance of the site would be a 43% increase in Muni patronage.

The Municipal Railway Five-Year Plan (1981-86) envisions a 25% increase in capacity which would be achieved in several ways, and a concurrent 25% growth in demand of the downtown service. Twenty-two additional LRVs are on order for use in the Muni Metro System. Construction of a loop to replace the existing stub-end terminal at The Embarcadero is planned, with a possible surface extension on The Embarcadero; implementation is partly contingent upon federal funding, which has not yet been secured. Also planned is the introduction of articulated buses with a capacity 50% larger than conventional buses.^{4/} None have been ordered to date.^{5/} Muni plans to put out a bid for 50 - 100 buses in September 1982; delivery would follow in about 18 months. Further integration of BART into the downtown transit system is planned by allowing use of Muni Fast Passes for travel on BART trains within San Francisco. Increased capacity is planned with use of express buses.

- Present scheduled outbound capacity on routes serving the Central Business District between 4:30 and 5:30 p.m. is about 47,000 passengers. The projected capacity in 1986 is about 54,000.^{4/} The increase in capacity is planned to approximately match the increase in demand, so that present operating conditions, such as excessive crowding on some vehicles, are not expected to improve. If demand increases more rapidly than capacity, the crowded conditions on some vehicles would be more severe.

- Present worst-case p.m. peak-hour conditions on outbound Muni vehicles within 2000 ft. of the project site consist of 11 lines having more than 150% of seated capacity, causing physical contact and conflicts in the aisle. Fifteen lines operate at 120-150% of seated capacity, where there is seldom a vacant seat and standees are uncomfortably close together. Six lines would operate at less than 120% of seated capacity where riders can avoid physical contact and conflicts. (See Table C-2, p. 187.)

BART

The BART system is currently operating at about 130% of its p.m. peak-hour seated transbay capacity of 11,200. It is anticipated that ridership and

capacity will increase concurrently by about five percent per year over the next five years. The planned capacity increase is contingent upon capital improvements, including laying of new tracks at locations in downtown Oakland and at the Daly City turnaround./6/ Potential development of 18 million sq. ft. of new office space in the City would create a demand for more than 4,000 new peak-hour trips on BART. This would represent more than a 36% increase in travel on BART. The five percent per year growth anticipated by BART planners would total a 27% increase in five years. Excess demand could be partly accommodated in AC Transit buses.

The effect of the proposed project would be to add a total of about 65 outbound p.m. peak-hour trips to BART, or about four per train.

AC Transit

AC Transit carries about 7,800 passengers, 100% of seated capacity, during the p.m. peak hour. Individual routes or buses may operate at higher load factors. Cumulative downtown development (18 million sq. ft. of office space) is projected to generate at least 5,000 additional AC Transit passenger trips during the p.m. peak-hour. There are presently no scheduled plans to purchase new buses./7/ New riders would at first be accommodated as standees. An overall increase in ridership of at most 50% could be accommodated in this manner if all buses were fully loaded.

SamTrans

SamTrans operates nine routes serving the downtown area during the p.m. peak hour, carrying about 1,200 passengers at 100% of seated capacity. Cumulative downtown development (18 million sq. ft. of office space) would increase ridership by more than 800. SamTrans will give priority to its commuter service to meet demand as the need arises./8/



Legend

- Pedestrian Entrances to Subway Stations
- BART and Muni Metro Station
- BART Route
- Muni Metro Subway
- Transit Route
- Cable Car Route
- Route Designation
- 59,60,35
- * Nearest Mission Street
- Bus Stops
- 2000' Radius

FIGURE 19: Muni Routes Near the Project Site

Caltrans Peninsula Train (Southern Pacific)

The Caltrans Peninsula Train carried approximately 4,400 riders between 7 a.m. and 9 a.m. on weekdays in February, 1982, or 71% of capacity, based on a seated capacity of 6,200 passengers. Evening peak-hour trains (4 p.m. to 6 p.m.) carried about 4,800 passengers, or 73% of capacity, based on a seated capacity of 6,600. Cumulative downtown development (18 million sq. ft. of office space) would create a demand for 2500 additional trips. Caltrans would expand capacity as ridership expands but currently has no specific capacity expansion plans./9/

Golden Gate Transit

Buses serving Marin and Sonoma Counties now carry 10,000 peak-hour passengers at 90% of seated capacity. The increase of about 2,910 passenger-trips from cumulative downtown development would cause demand to exceed supply by about 29%./10/

During the peak hour, the Sausalito and Larkspur ferry routes have a combined seated capacity of 1,470 passengers and carry 1,100, or 75% of seated capacity. By 1984, the demand for peak-hour service would increase to 2,000, or 136% of seated capacity. Maximum allowed riderships on the Sausalito and Larkspur ferries are about 130 and 150% of seated capacity, respectively./10/ If some of the ferry service were discontinued, these trips would occur by bus or automobile. Golden Gate Transit plans to acquire 72 additional buses by 1985, capable of carrying a total of 3,530 seated passengers. This additional service would accommodate all projected growth in agency patronage and some reduction of ferry service.

RIDES for Bay Area Commuters

The number of persons riding in van pools to and from downtown San Francisco is approximately 4,000./11/ The RIDES program leases vans as needed for user groups. Funding, except for administrative costs, is entirely by users. The program also provides matching services for carpoolers.

PEDESTRIANS

During construction, sidewalks may be closed. A covered pedestrian walkway would be provided along the west side of New Montgomery St. and the north side of Mission St. as necessary.

Upon project completion, the net increase in pedestrian travel to or from the project site during the p.m. peak-hour would be about 340 person-trips. This estimate includes trips begun or completed on public transit or in automobiles parked off-site, and deletes trips made to the existing garage on site (about 70) and trips which would be made in automobiles from the proposed on-site garage (20). These trips would use the New Montgomery and Mission St. sidewalks, which have a capacity of about 10,000 trips per hour, increasing pedestrian traffic on the New Montgomery St. sidewalk to about 12% of capacity.

The cumulative effect of other new development at locations within 2,000 ft. of the site would be to increase pedestrian traffic about 30% above existing levels. This would add about 200 pedestrians to the Mission St. sidewalk, increasing volumes there to about 14% of capacity (see Table C-5, p. 190). The flow would become somewhat impeded, but individual pedestrians would retain some freedom to select walking speed and could avoid conflicts.

The project alone would not noticeably affect the operation of the crosswalks at the Mission / New Montgomery intersection, but the cumulative effect of development in the area would be to increase pedestrian traffic in the crosswalks across Mission St. to about 65% of capacity, from 50% of capacity.

The project would eliminate three existing curb cuts which now serve the garage on the site, and would increase use of the Aldrich Alley curb cut; the alley would be widened to 10 ft. curb-to-curb. The basement-level parking garage would generate about 70 vehicular trips through the curb cut across the New Montgomery St. sidewalk each day. Almost 15 would occur during the p.m. peak hour, or an average of one every four minutes. These vehicles, principally outbound during the p.m. peak hour, would be expected to clear the sidewalk at the end of the New Montgomery St. green phase of the signal at the

intersection with Mission St. At present, the queue of vehicles in the right-turn lane of the southbound approach of New Montgomery St. to Mission St. extends north of Aldrich, clearing out when the light turns green, except for one or two vehicles./12/ Vehicles exiting Aldrich onto New Montgomery St. would be stopped across the sidewalk for periods of up to one minute, the length of the signal cycle. Average delay would be roughly one-half minute, so that the sidewalk would be blocked about 10% of the time.

VEHICULAR TRAFFIC

Peak-hour vehicular traffic to and from the project site would decrease as the project would effect a net loss of about 75 parking spaces by demolition of the parking garage on the site. In the downtown area as a whole, it is also to be expected that the project would effect a small decrease in peak-hour vehicular traffic, because displaced parkers would not be able to find other parking downtown or would themselves displace others from automobile use as discussed at the beginning of this section.

The cumulative effect of development in the area would be to increase peak-hour vehicular traffic by about one percent per year. The net reduction in traffic through the Mission / New Montgomery intersection due to this project would be offset by the increase anticipated from other development in the area, so that operating conditions would remain substantially unchanged.

PARKING

The project would generate a demand for about 130 long-term parking spaces, and 30 short-term spaces./13/ An additional demand for a maximum of about 100 long-term parking spaces would be created by demolition of the existing parking garage. Twenty-three parking spaces would be provided in the basement of the proposed building.

The City's Planning Code does not require the provision of offstreet parking in any C-3 district. The 1977 "Revision to the Transportation Element of the

Master Plan Regarding Parking" (adopted by CPC Resolution 7647) discourages the provision of long-term parking spaces in the downtown core area where the site is located.

Access to the project garage would be via a ramp from Aldrich Alley; the ramp would be 10 ft. in width and about 75 ft. in length. Aldrich has a width (curb-to-curb) of seven ft., and a wall-to-wall width of about 12 ft. It would be widened to a (curb-to-curb) width of 10 ft. and a wall-to-wall width of about 14.5 ft. for the depth of the site. Vehicles inbound to the garage would enter Aldrich Alley from New Montgomery St. and proceed down the ramp via a lateral movement (see Figures 4 and 5, pp. 11 and 12). Outbound vehicles would exit onto New Montgomery St. by retracing the path of inbound vehicles. Both Aldrich Alley and the ramp would be too narrow to allow one vehicle to pass another. Use as long-term parking would reduce conflicts between inbound and outbound vehicles, caused by two-way operation of the one-lane ramp, and between vehicles and pedestrians in the curb cut. The applicant would determine the type of parking to be provided in consultation with the Department of City Planning and the Department of Public Works.

The total effect of the project would be to create a demand for 230 long-term spaces and 30 short-term spaces. The proposed garage would provide spaces to meet about 10% of the total demand. Through competition, many of the parkers from the project, and many of those displaced from the existing garage, would find spaces downtown, but in so doing would displace others to transit use, to parking in peripheral areas, or to ridesharing.

- The project would have an average seven space deficit for short-term parking. Within the near vicinity (about 1,000 ft.) of the project site approximately 2,650 off-street commercial parking spaces are available. About 270 of these spaces are located on a site of proposed future construction and about 800 of these spaces are located on parcels in the Yerba Buena Center Redevelopment Area that could eventually be sites of future construction. Average daytime occupancy in the unaffected spaces is approximately 91% with about 150 spaces open at any one time. Cumulative short-term parking demand from proposed and under construction buildings near the project is estimated to be 100 spaces. The short-term parking supply in the area within 1,000 ft. of the project

would exceed the cumulative demand by about 40 spaces assuming the removal of off-street parking by proposed buildings.

- Long term parking demand for the cumulative development in the greater downtown area has been estimated to be 15,600 spaces (including the project). The project would represent 0.8% of the total demand. Long term parking demand has been assumed to be distributed over the greater downtown and south of Market areas rather than being concentrated near the proposed project locations. Long term parking demand is typically work (employee) related and is more likely to be influenced by cost rather than by location. A recent survey by the Department of City Planning shows that there are about 37,000 off-street parking spaces in the C-3 zoning area and an additional 6,500 spaces in the area bounded by The Embarcadero, Folsom, Eighth and Bryant Sts./14/ Based upon average occupancy, about 4,100 spaces are available on a daily basis. The cumulative demand for the whole downtown area would create a net deficit of 11,500 spaces.
- The deficit would most likely be less as the survey did not inventory parking in the Civic Center area, the areas west of Eighth St., south of Bryant St. or north of Washington St. The survey did indicate that inside the study area about 6,000 parking spaces have been added since 1967 and approximately 1,400 are proposed to be added (exclusive of any parking to be provided in Yerba Buena Center).
- The Master Plan Parking Policy has stated the need to "encourage short-term use of existing parking facilities within and adjacent to the downtown core by converting all day commuter parking to short-term parking in areas of high demand or to car/van pool parking where short-term parking demands are low."/15/ Accordingly, approximately 14,000 existing off-street spaces in the C-3-O planning district could be converted to short-term only parking if the City enacted legislation to establish public control over private garages.
- Imbalances in long-term parking demand and potentially supply, given projected cumulative development and demand, would be expected to encourage the use of car pools and van pools, or the creation of satellite (intercept) parking facilities in outlying non-residential areas, with shuttle or expanded Muni

service to the downtown area, or increased use of transit directly for commuters from San Francisco or from suburban centers (East Bay, North Bay, Peninsula). Peninsula residents, for example, could find Southern Pacific commuter trains more attractive if they could not get any closer to downtown by car than the train terminal at Fourth and Townsend Sts. All transit options would add to the burdens of the regional and local transit system, particularly Muni.

- The project sponsor prefers the No-Parking Alternative. Therefore, no parking and no basement would be provided.

SERVICE VEHICLES

During construction, most trucks at the site would be too large to use Aldrich Alley. A temporary loading zone could be provided along New Montgomery St. which, when used, would block a certain length of the right-turn lane into Mission St. The queues of vehicles in the right-turn lane now extend during the p.m. peak hour to north of Aldrich Alley, clearing out on each green cycle except for one or two vehicles. Vehicles legally parked in front of the Call Building, on the west side of New Montgomery St. and north of Aldrich Alley, effectively limit use of the curb lane for turns to the segment south of Aldrich Alley. North of Aldrich, right-turning vehicles are sometimes queued

in the through lane. The temporary loading zone would further shorten the turning lane so that right-turning vehicles would remain in the through lane until within about three car lengths of Mission St. The other through lane on New Montgomery St. is also used for left turns. Because both turning movements are delayed by pedestrians in crosswalks, through movements would be significantly restricted, causing a significantly worsened service level at the intersection (from C to perhaps E) during the p.m. peak hour if construction vehicles were in the loading zone.

These problems could be avoided by locating the temporary loading zone on Mission St. Construction vehicles being maneuvered into and out of this space would sometimes impede bus traffic, and vehicular traffic from the right-turn lane of the southbound approach of New Montgomery St. to Mission St., in the outer westbound traffic lane of Mission St. Since the curb lane on Mission St. is not a traffic lane, even during the 4 - 6 p.m. period when a tow-away zone is in effect, the effect of construction loading activities there would not have the potential of causing traffic backups.

The project would have an enclosed loading space at grade, 52.5 ft. long, 12 ft. wide, and 12 ft. high, to be entered by a backing maneuver with lateral movement from Aldrich Alley (see Figure 20, p. 73). Available space would allow a maximum outer turning radius of about 25 ft. for each turn of the maneuver. In the geometric design of roadways, such turning radii are considered adequate for full-sized automobiles, and most light trucks and light vans having just two wheels per axle. Delivery vehicles would enter Aldrich Alley via a right turn from New Montgomery St. and exit Aldrich Alley via a left turn onto Annie St., which is one-way southbound and controlled by a stop sign at Mission St. (see Figure 20, p. 73). Trucks which have four wheels on an axle typically have a width (hub cap to hub cap) of 8 to 8.5 ft. These vehicles would not be able to use Aldrich Alley because its curb-to-curb width would continue to be only 7 ft., west of the site. Light trucks and vans which could use the loading docks would be able to make the left turn from Aldrich on to Annie St.

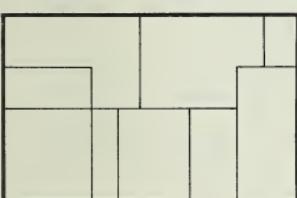
Market Street



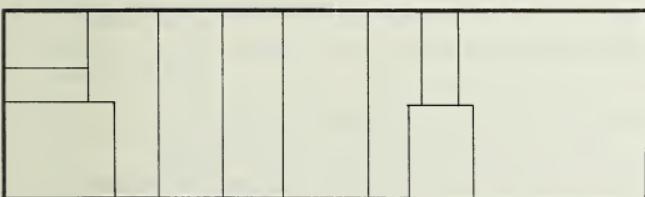
Stevenson Street



Jessie Street

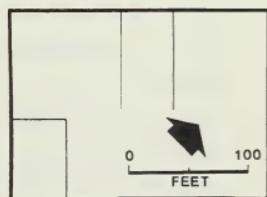
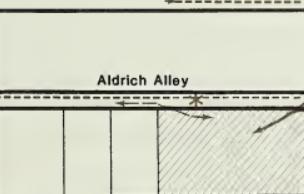
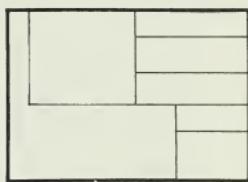
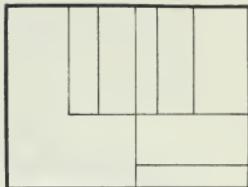


Mission Street



Minna Street

New Montgomery Street



Legend

- ▲ One Way Street
- Service Vehicles
- Backing Maneuvers
- Automobiles

* Curbside loading from service vehicles could occur here.

FIGURE 20: Automobile and Service Access to the Site

SOURCE: Environmental Science Associates, Inc.

The project would generate a demand for an additional loading space to accommodate the heavier trucks and vans which could not be accommodated in the Aldrich Alley loading dock. A curbside loading zone could be designated on Mission St., where a tow-away zone is in effect during peak hours. Parking maneuvers of large trucks would momentarily impede Muni operation in diamond lanes there.

Alternately, large trucks might use the curb lane on New Montgomery St. south of Aldrich Alley for loading. This lane of New Montgomery St. is currently designated by a red curb and lane markings as a right-turn lane. Use of this lane as a loading zone, if approved by the Department of Public Works, would increase the traffic volume on the two remaining lanes. During the evening peak hours, between 4 p.m. and 6 p.m., it is presumed that the right lane would be designated as a tow-away zone for use by right-turn traffic. Use of Aldrich Alley for on-street loading by the heavier trucks would impede traffic flow on New Montgomery St. during the maneuvering required for trucks to enter and leave the alley. To load or unload from the side, such trucks would line up so that their doors would be opposite the loading dock entrance. This would block access and/or egress at the loading dock during the time required for loading or unloading such trucks. It would also block any through traffic on Aldrich Alley. Trucks parking in Aldrich Alley to unload at the project site would also limit access to the sites along Aldrich Alley west of the project site if these sites were developed with loading facilities at a later date.

The single off-street loading space to be provided on Aldrich Alley would meet the City Planning Code requirements with respect to its dimensions and to the number of such spaces required. CPC Resolution 9286 states the intention of the Commission regarding requirements for loading spaces, and generally requires a greater number of spaces for office uses than does the Code. Applied to this building, the resolution would require one space, as proposed.

NOTES - Transportation

/1/ Modal splits and trip generation factors recommended by the Office of Environmental Review of the Department of City Planning, in "Attachment 1" of "Guidelines for Environmental Evaluation of Transportation Impacts" were

used. Peak-hour (person) trips would be generated at a rate of 3.5 trips per 1,000 sq. ft. of office space.

/2/ Modal shift projections contained in the Municipal Railway Five-Year Plan (1981-86) were used. These projections are consistent with an assumption that no new long-term parking will be provided downtown.

● /3/ Department of City Planning, Working Paper I, Projection of Long-range Transportation Demand, May, 1982, prepared in cooperation with the Metropolitan Transportation Commission (MTC), the Association of Bay Area Governments (ABAG), and the Municipal Railway (Muni). Employment trend data was compiled by ABAG from trends in County Business Pattern (U.S. Department of Commerce, Bureau of the Census, March 12, 1979), with 1979 as the base year for future projections and regional distributions. Modal split data are from the 1975 Travel Survey prepared by MTC.

● /3A/ The Department of City Planning, Office of Environmental Review (OER), has issued a memorandum, dated July 2, 1982, dealing with the subject of the differences in the land-use and employment trend approaches, and recommending that both approaches be used in future EIRs "to give a more balanced assessment of future peak transportation demand." This memorandum is on file with and available from the Office of Environmental Review, 450 McAllister St., 5th Floor. The memorandum calls out some of the fundamental differences between the two approaches and also details the limitations of each approach."

/4/ Municipal Railway Five-Year Plan (1981-86).

/5/ Tony Bruzzone, Muni Planner, telephone conversation, May 6, 1982.

/6/ Marty Birkenthal, Research Analyst for BART, telephone conversation, November 16, 1981.

/7/ Ted Reynolds, Senior Planner, AC Transit, telephone conversation, March 19, 1982.

/8/ George Kipp, Transportation Planner, San Mateo Transit District, telephone conversation, November 5, 1981.

/9/ Elmer Hall, Railroad Consultant, Caltrans, telephone conversation, April 22, 1982.

/10/ Allen Zahradnik, Senior Planner, Golden Gate Transit, telephone conversations, December 11, 1981 and March 29, 1982.

/11/ Frank Harris, Operations Manager, RIDES for Bay Area Commuters, Inc., telephone conversation, May 5, 1982.

/12/ From observations made by the consultant ESA on Monday, January 11, 1982.

/13/ Trip generation factors recommended by the Office of Environmental Review of the Department of City Planning, in "Attachment 1" of "Guidelines for Environmental Evaluation of Transportation Impacts" were used: 57% for work purpose (long-term parking), vehicle occupancy of 1.4, short-term parking turnover rate of four per ten-hour day.

- /14/ Inventory of Off-Street Parking Spaces, San Francisco Department of City Planning, May 24, 1982.
- /15/ Revisions to the Transportation Element of the Master Plan Regarding Parking, Resolution 7647, San Francisco Planning Commission, January 20, 1977."

D. OPERATIONAL AIR QUALITY

Project operation and related activities would affect air quality in two ways: emissions would be generated by project-related traffic and by combustion of natural gas for space and water heating. Daily emissions of pollutants resulting in 1985 from all project-related vehicular and stationary natural gas combustion were calculated and are shown in Table 4.

TABLE 4: PROJECTED DAILY PROJECT-GENERATED EMISSIONS IN 1985 (tons/day)

	Vehicular Fuel Combustion*	Natural Gas Combustion**	Total Project Emissions	1985 Projected Regional Emissions***
Carbon Monoxide	0.193	negligible	0.193	3,367
Hydrocarbons	0.017	negligible	0.017	797
Nitrogen Oxides	0.018	negligible	0.018	692
Sulfur Oxides	0.002	negligible	0.002	435
Particulate	0.003	negligible	0.021	192

*BAAQMD, 1981, EMFAC-6C Vehicular Emission Factors.

**U.S. EPA, 1977, Compilation of Air Pollutant Emission Factors, AP-42, Third Edition, p. 1.4-2. Negligible is less than 0.001 tons/day.

***Association of Bay Area Governments (ABAG), BAAQMD, MTC, 1979, 1979 Bay Area Air Quality Plan, pp. 62-64. The region is the nine-County Bay Area Air Quality Management District.

SOURCE: Environmental Science Associates, Inc.

The project would result in the elimination of approximately 75 parking spaces, net. As discussed in Section IV.C., p. 63, the project would not have a significant net effect on area traffic volumes. Competition for parking spaces would become apparent in the future so any project-generated traffic would displace previous motorists. Therefore, the net effect of the project on traffic volumes cannot be reliably quantified. Curbside carbon monoxide (CO) analysis was carried out for worst-case meteorology and dispersion conditions for streets adjacent to and carrying project-generated traffic; the results are shown in Table 5.

Combustion of natural gas for space and water heating would generate negligible amounts of carbon monoxide, sulfur oxides, nitrogen oxides and particulates when compared to 1985 projected regional emissions.

In summary, implementation of the project would add to local and regional accumulations of CO, hydrocarbons and nitrogen oxides (the latter two being

● TABLE 5: PROJECTED LOCAL CURBSIDE CARBON MONOXIDE IMPACTS*

Street	Averaging Time	Existing	1985**	1985** + Project
Mission (west of New Montgomery)	1-hour	16.8 ppm	15.1 ppm	15.2 ppm
	8-hour	<u>9.1</u> ***	7.9	7.9
New Montgomery (north of Mission)	1-hour	14.1	12.1	12.2
	8-hour	8.2	7.0	7.0

* Calculations were made for worst-case dispersion meteorology according to BAAPCD (now BAAQMD), 1975 Guidelines for Air Quality Impact Analysis of Projects, updated for EPA, EMFAC-6C motor vehicle emission rates, 1981.

** Projected 1985 traffic volumes include non-analyzed growth (1% per year), cumulative development and the project. Air quality improvements result from continuing introduction of autos with improved pollution control devices, and phasing out of older, more-polluting vehicles.

*** Underlined values are those exceeding the applicable standard (35 ppm for one hour, 9 ppm for eight hours).

SOURCE: Environmental Science Associates, Inc.

precursors of ozone), particulates, and sulfur oxides during adverse meteorological conditions, such as inversions. The Bay Area Air Quality Plan found that ozone would continue to be a problem, and that substantial reductions in hydrocarbon emissions would be necessary to attain and maintain the ozone standard in the Bay Area.^{/1} CO and particulates are also a problem on a local scale. Because the project would increase emissions of hydrocarbons, CO, and particulates, attainment of the standards would be impeded. The project would have no measurable impact on citywide or regional concentrations nor on the frequency of violations of the standards. Cumulative development, on the other hand, could increase ambient concentrations and the frequency of standard violations, but neither the project nor other developments in the project vicinity would conflict with the control strategies of the Bay Area Air Quality Plan.

NOTE - Air Quality

^{/1} ABAG, BAAQMD, and the Metropolitan Transportation Commission (MTC), January 1979, 1979 Bay Area Air Quality Plan, San Francisco Bay Area, Environmental Management Plan.

E. CONSTRUCTION NOISE

As is typical of downtown San Francisco, the ambient noise of the site is determined primarily by vehicular traffic. Trucks, buses, automobiles, and emergency vehicles, as well as construction equipment, are the major contributors to the level of noise. The Environmental Protection Element of the Comprehensive Plan indicates an existing day-night average noise level (L_{dn})/1/ of 70 dBA/2/ on New Montgomery St. and 75 dBA on Mission St./3/

Project construction would occur in three stages: demolition, excavation and construction. Throughout the 18-month construction period trucks would visit the site, initially hauling away dirt and debris and then delivering building materials. These activities would be audible in the project vicinity and would represent distinct noise intrusions.

During construction each piece of powered equipment, other than impact tools, would have to comply with the San Francisco Noise Ordinance (Section 2907b) requirement of a sound level of not more than 80 dBA at 100 ft. If a second piece of equipment were to be used simultaneously with the first, the resultant noise level would be increased by 3 dBA, resulting in an 83 dBA noise level. The Noise Ordinance (Section 2908) also prohibits construction work at night from 8:00 p.m. to 7:00 a.m., if noise from such work exceeds the ambient noise level by 5 dBA at the property line, unless a special permit is authorized by the San Francisco Department of Public Works. During construction many types of equipment are used. Typical construction noise levels are shown in Table 6.

Buildings in the project vicinity sometimes require open windows for ventilation. Noise levels during construction (excavation and exterior finishing) would reach as high as 75 dBA inside the Call Building, 70 dBA inside the Rialto Building and the Crocker Bank Administrative Offices in the Crossley Building, and 60 dBA in the 650 Mission St. building. Noise levels of 70 to 75 dBA result in intermittent communication impairment, requiring raised voices at distances greater than two feet, and restrict telephone use to a marginal level./4/ Noise has also been associated with narrowing the focus of attention and therefore workers would also likely be distracted and their performance degraded.

TABLE 6: TYPICAL COMMERCIAL/INDUSTRIAL CONSTRUCTION NOISE LEVELS AT 50 FEET

<u>Construction Phase</u>	<u>Duration of Phase</u>	<u>Average Noise Level</u>
Ground Clearing	4 weeks	84 dBA
Excavation	None required	89
Foundations	7 weeks	78
Erection	12 weeks	87
Finishing	46 weeks	89

SOURCE: D.N. May, Ph.D., 1978, Handbook of Noise Assessment, Van Nostrand Reinhold Environmental Engineering Series, p. 211.

Noise is responsible for induction of a generalized stress reaction at levels far below those responsible for induction of hearing damage./5/ Dilation of pupils, increased pulse pressure and heart rate, and pulse volume changes (all signs of the general stress reaction), have been observed in humans exposed to noise levels of approximately 70 dBA./6/ General psychological distress produced by noise can add to overall stress and in this way contribute to the incidence of nonauditory disease./7/

The project would require three weeks of pile driving. The Noise Ordinance (Section 2907c) limits noise emissions from impact tools and equipment to 80 dBA at a distance of 100 ft. unless the Director of Public Works has approved intake and exhaust mufflers and shields or shrouds which provide maximum noise attenuation.

Conventional unmuffled and unshielded pile drivers emit noise levels of 100 to 110 dBA at a distance of 100 ft. each time the driver strikes the pile. The quietest impact pile driver measured by the City generated noise levels of 98 dBA at 50 ft., but is not always compatible with construction requirements./8/ Actual noise emissions are dependent upon soil characteristics and the type of piles. On the assumption that noise emissions

of 100 dBA at 100 ft. would occur, pile driving would be audible to people on the streets within 1,000 ft. of the project site, where not shielded by intervening buildings.

During pile driving, noise levels would reach as high as 85 dBA in the Call Building, 80 dBA in the Rialto Building and the Crocker Bank Administrative Offices, and 70 dBA with noticeable vibrations in the 650 Mission building. General stress reaction has been observed in humans exposed to brief sounds of 70 dBA.^{/7/} Noise at these levels would require workers to close the windows or shout to communicate. Intermittent noises, such as pile-driving noise, reduce the perception of control over the environment. This loss of control frequently results in a depressed mood and depressed motivation.^{/5/} Repeated impulse and intermittent sounds of high level appear more likely to disrupt performance than continuous or steady sounds of comparable level.^{/4/}

The Department of Public Works (DPW) analyzes pile driving impacts for every project. In commercial areas DPW frequently restricts pile driving to the hours between 1 p.m. and 9 p.m. All measures imposed by DPW are negotiable and are subject to revision during construction should circumstances require new action.^{/8/}

NOTES - Construction Noise

/1/ L_{dn} , the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises. Noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise.

/2/ dBA is the measurement of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound.

/3/ Department of City Planning, Environmental Protection Element of the Comprehensive (Master) Plan, September 1974, page 17.

/4/ National Institute for Occupational Safety and Health, Occupational Exposure to Noise, U.S. Department of Health, Education and Welfare, 1972.

/5/ Sheldon Cohen, et al., "Cardiovascular and Behavioral Effects of Community Noise", American Scientist, Volume 69, October 1981.

/6/ Bolt, Beranek and Newman, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, U.S. EPA, 1971.

/7/ The Central Institute for the Deaf, Effects of Noise on People, U.S. EPA, 1971.

/8/ Ray McDonald, Chief Building Inspector, Bureau of Building Inspection, Department of Public Works, telephone conversation, July 6, 1981.

F. ENERGY

The project site is served by Pacific Gas and Electric Company (PG&E), which supplies natural gas, electricity, and energy conservation assistance to its service area. PG&E obtains some of the electricity it supplies from renewable geothermal and hydroelectric sources. Coal, oil, natural gas, and nuclear fuels, all nonrenewable sources of energy, are used to generate most of the electricity PG&E provides. Operation and maintenance of the existing parking garage on the site is estimated to require annually a total of less than five billion British thermal units (Btu) of electricity, natural gas, and other energy resources./1/

Construction Energy Requirements

Removing the parking garage would require an unknown amount of energy for demolition and debris removal. Site development, fabrication and transportation of building materials, worker transportation, and building construction would require a total of about 237 billion Btu of gasoline, diesel fuel, natural gas, and electricity, based on a recent study of construction in the U.S./2/

Operational Energy Requirements

Electricity and natural gas for project operation would be provided by PG&E; PG&E's electricity and natural gas distribution systems in the site vicinity are adequate to serve the project./3,4/ PG&E would probably meet new electrical demand primarily through increased use of coal, oil, natural gas, and nuclear fuels. Cogeneration (i.e. production of electricity from waste

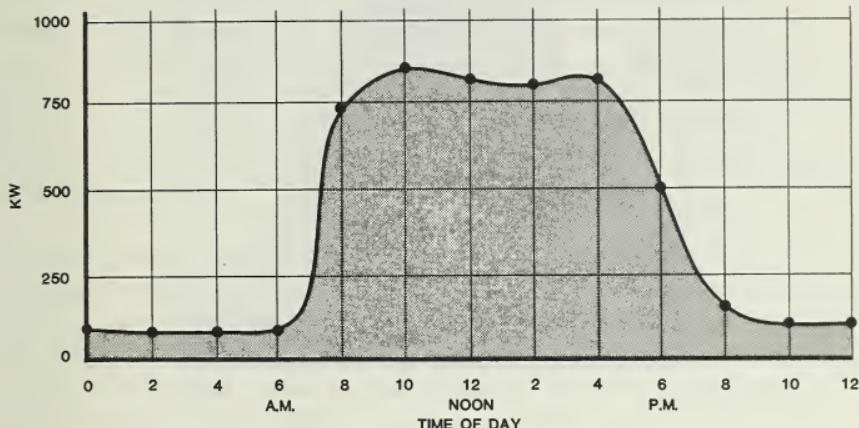
heat generated by industrial processes), wind turbine generators, and purchases of electricity from other utilities may also supply future electrical demand.

Electricity would be used by the project for lighting, air conditioning, ventilation, elevator operation, office equipment operation, and plumbing system pumping. Natural gas would be used to supply space and water heating via hot water boilers. Low-sulfur fuel oil would power the emergency generator and fire pump. The project would make no use of solar energy or other renewable energy resources.

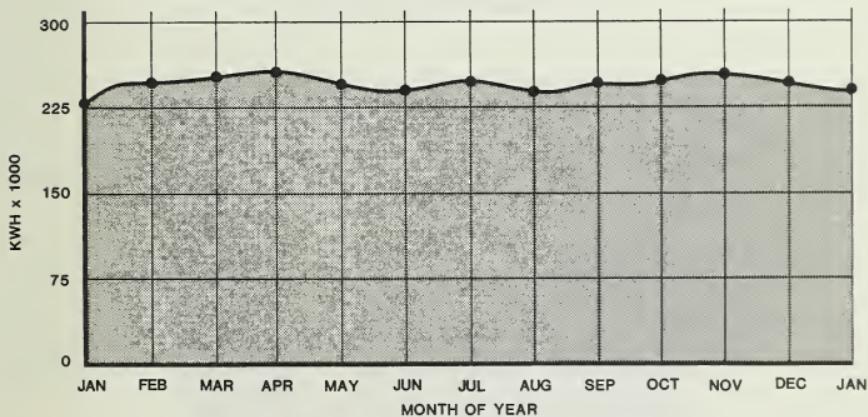
The project's connected kilowatt load would be about 1,175 kilowatts, and the project would consume about 2.9 million kilowatt-hours (kwh) of electricity annually, or about 241,000 kwh per month./5/ Peak electrical demand would be about 850 kw, and would occur between 8 a.m. and 5 p.m. in the spring and fall. Peak day electrical demand and annual electricity consumption curves for the project are given in Figure 21, p. 83.

The project would consume about 2.2 billion Btu (about 2 million cu. ft.) of natural gas annually, or about 187 million Btu per month./5/ Natural gas use would peak between 7:00 and 9:00 a.m. on January mornings as the hot water boilers begin heating the building. Peak day and annual natural gas consumption curves for the project are given in Figure 22, p. 84. The project's energy budget is similar to that of other office projects proposed recently for downtown San Francisco.

The project's estimated per-sq.-ft. electricity requirement, 1.7 kwh per month, is higher than an estimated average per-sq.-ft. requirement of 1.4 kwh per month estimated for 16 other proposed projects (see Appendix E, p. 198). The project's per-sq.-ft. natural gas requirement, 1,300 Btu per month, is less than 50% of an estimated average per-sq.-ft. requirement of 3,200 Btu for 16 other proposed projects. The project's total annual per-sq.-ft. energy requirement, 221,000 Btu, is close to the average of 212,000 Btu estimated for the other projects.



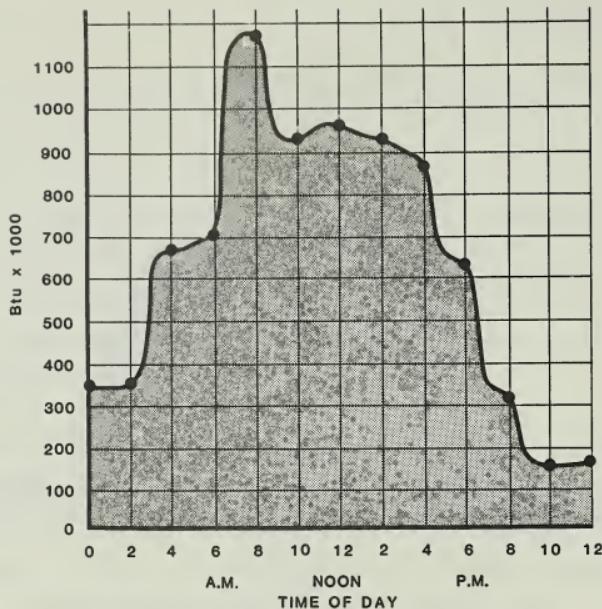
Daily Electrical Load Distribution (Peak Day)



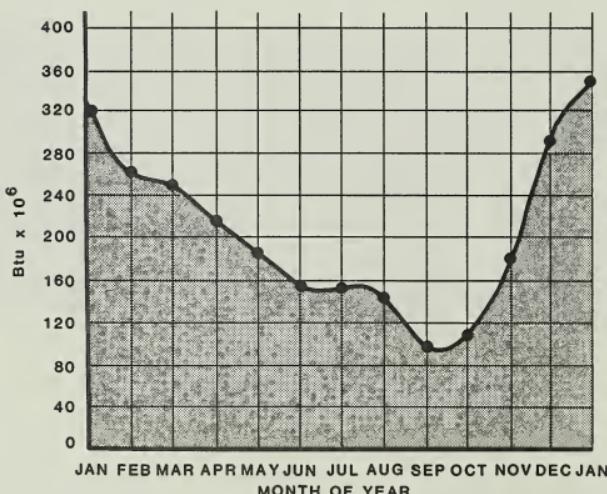
Annual Electrical Load Distribution Curve

SOURCE: Glumac and Associates

FIGURE 21: Projected Electrical Load Distribution Curves



Daily Natural Gas Load Distribution Curve
(For Peak Winter Design Day)



Annual Natural Gas Load Distribution Curve

SOURCE: Glumac and Associates **FIGURE 22: Projected Natural Gas Load Distribution Curves**

- Several aspects of the project's energy system are not yet resolved, so a comparison of the project's energy budget with the building performance standards set by Title 24 of the California Administrative Code would be premature./6/ The project could comply with the requirements of Title 24 either by meeting prescriptive standards for insulation, weather stripping, glazing area, mechanical equipment efficiency, and other energy conservation measures, or by meeting the performance standards./6a/ The project is required by state law to be in compliance with Title 24 prior to the issuance of building permits.

Project-related transportation would cause additional, offsite energy consumption. Based upon the project trips described in the Transportation Section, project-related trips would require about 76,000 gallons of gasoline and diesel fuel and about 176,000 kwh of electricity annually. The total transportation demand, converted using at-source factors to a common unit, would be about 12.6 billion Btu.

Shadows from the project would decrease passive solar heating and daylighting of structures north of the project site, primarily the Call Building. In winter, about 1,500 to 2,500 sq. ft. of window area on the Call Building's southern facade would be shaded by the project (see Figures 13 through 18, pp. 38 - 50), possibly increasing the Call Building's heating requirements. During summer, the Call Building's air conditioning load could decrease somewhat because of shading by the project.

The project would shade the southern facades of the Sheraton Palace Hotel and buildings on the east side of New Montgomery St. between Jessie St. and Market St. for short periods on winter days. The net change in energy consumption of adjacent buildings due to project shadows is unknown, but is probably not substantial.

Cumulative increases in energy consumption in downtown San Francisco by approved and recently proposed projects would increase annual electricity consumption by more than 236 million kwh and would increase annual natural gas

- consumption by more than 520 million cu. ft. Total increase in building energy demand would be about three trillion Btu annually, equivalent to about 500,000 barrels of oil per year.

NOTES - Energy

/1/ The British thermal unit (Btu) is a unit of heat energy equivalent to the quantity of heat required to raise the temperature of one pound of water at sea-level one degree Fahrenheit. All Btu values given in this section are at-source values, meaning that they have been adjusted to include the energy required for their generation and distribution, as specified in Energy Conservation and Design Manual for New Nonresidential Buildings, Energy Resource Conservation and Development Commission, 1977.

/2/ Hannon, B. et al., 1978, "Energy and Labor in the Construction Sector," Science 202: 837-847.

/3/ George Pavana, Pacific Gas and Electric Company; February 11, 1982; as reported to ESA by Dart Reinfort, Glumac and Associates, letter, February 16, 1982.

/4/ Jerry Tyson, Pacific Gas and Electric Company; February 11, 1982; as reported to ESA by Dart Reinfort, Glumac and Associates, letter, February 16, 1982.

/5/ No comprehensive building energy modeling was performed for the project. Natural gas and electricity loads for the project were estimated by the project engineers, Glumac and Associates, with data obtained from an existing building in San Francisco similar to the project in size, operating characteristics, mechanical equipment, and design features. These data were adjusted for differences in glass exposure, orientation, and shading. Building occupancy was assumed to be 26 days per month (natural gas) and 26 days per month (electricity); heating system efficiency was assumed to be 70%, lighting was assumed to be two watts per sq. ft., and wall receptacle loads were assumed to be 0.5 watts per sq. ft.

/6/ California Energy Commission, 1980, Conservation Division Regulations Establishing Energy Conservation Standards for New Nonresidential Buildings.

- /6a/ Compliance with the Title 24 prescriptive standards is achieved by constructing the project in accordance with certain physical specifications such as for weatherstripping on doors and windows, and installing appliances and equipment that meet energy efficiency standards. Compliance with the performance standard is achieved by demonstrating that the building's annual energy consumption would not exceed the allowable annual energy budget specified by the California Energy Commission; the energy budget takes into consideration the mix of uses proposed, and is expressed in Btu per sq. ft. of conditioned floor area. Projects that meet the performance standard need not meet the prescriptive standard.

G. GEOLOGY, SEISMOLOGY, AND HYDROLOGY

GEOLOGY

The project would require little new excavation as the site has already been excavated to a depth of ten ft. for the existing basement. Additional excavations at the site would consist primarily of those necessary to install

IV. Environmental Impact

pile caps, grade beams, and elevator shafts. It is expected that such excavations would be less than ten ft. below the basement level. If the excavation pit was not properly shored, the weight of oversize material could initiate lateral flows into the pit. Such flows could result in settling of nearby buildings.

Removal of unstable man-made fill may not be necessary if the building is supported on piles, as proposed. The piles would extend through the upper marine deposits into more-stable, denser sand and clay deposits. The exact depth of the piling tips and the size and capacity of individual piles would be determined following a detailed foundation investigation.

During site excavations, the removal of spoils could cause spillage of sand and silt in the streets along haul routes. This spillage could present an inconvenience and safety hazard for pedestrians, motorists and bicyclists. The dirt could also be a source of airborne dust, and sedimentation in affected storm drains.

Localized dewatering of the excavation pit may be necessary for some of the additional excavations depending on their depth, but would be expected to be negligible./1/ Should more extensive dewatering be necessary, it could cause settlement in the soils adjacent to the excavation, causing neighboring buildings which lack rigid footings to crack or lean out of plumb, and their floors to bend or tilt out of horizontal. Settlement could also cause cracks in adjacent streets or sidewalks, and could damage underground utility lines. Because of the potentially high costs of repairs associated with such damages, the Department of Public Works generally requires that a safety bond be posted before issuing an excavation permit.

SEISMOLOGY

Strong ground shaking during a major earthquake could damage the proposed office building, but would not be expected to cause its collapse. The building would be constructed with a moment-resisting frame on a pile foundation designed and constructed under the supervision of a structural and geotechnical engineer./2/ It would be designed to meet seismic standards of

the San Francisco Building Code and the Uniform Building Code. The swaying motion of the building during a major earthquake, particularly one of long duration, could topple bookcases, overturn furniture, or cause the collapse of heavy ceilings, light fixtures and unattached objects. Upper floors of the building could sway up to about 12 in.; this could result in falling and breaking glass which would present a hazard to pedestrian and vehicular traffic below. The parking structure currently on the site has no windows above street level and does not present a hazard from falling glass. Aluminum panels on the exterior of the building would be attached to structural frames and would probably not be damaged by this swaying motion.

If liquefaction, lateral landsliding, or rapid settlement were to occur in the vicinity, water mains, pipes, and underground utility lines could break, leaving the building without water, power, or telephone communications. Elevators could be rendered inoperable due to loss of power or damage to the elevator system. Local streets could buckle or crack due to lateral landsliding accompanying liquefaction or rapid settlement. Emergency water storage and pumping facilities would be incorporated into the building as required by City code.

HYDROLOGY

As with the existing structure, the proposed building would occupy the entire site; no change in surface runoff from the site would be expected. The project would have negligible impact on precipitation patterns in the area.

The proposed building design indicates that the basement would be about 10-15 ft. below ground level. This is expected to be above the groundwater table./3/ If the groundwater table is higher than anticipated, a small amount of dewatering could be required; however, experience with the present basement indicates that this would probably be unnecessary. It is not anticipated that a permanent subdrain system would be required beneath the building./3/

During construction, excavated material could be a source of siltation in storm drains; however, no effects on stormwater runoff quality are expected.

IV. Environmental Impact

Because dewatering during construction would be very limited, it is expected to have negligible effects on stormwater runoff quality and storm sewer siltation.

NOTES - Geology, Seismology, and Hydrology

/1/ Richard Rogers, Engineer, Lee and Praszker, Geotechnical and Foundation Engineers, telephone conversation, February 16, 1982.

/2/ A moment-resisting frame emphasizes the strength of the connections between vertical columns and horizontal beams in order to resist lateral forces such as those created by earthquakes and high winds.

/3/ Lee and Praszker, Geotechnical and Foundation Engineers, February, 1982, Preliminary Geotechnical Investigation; proposed New Montgomery Street Office Building, San Francisco, California

H. EMERGENCY RESPONSE PLAN

The Mayor's Office of Emergency Services (OES) is preparing an emergency response plan to be implemented in the event of an earthquake or other emergency. The plan will identify roles and responsibilities of government agencies which would be involved in the event of a city emergency./1/ Included in this plan are a series of casualty and mass care centers that have been established on a district basis and would provide first aid and essential social services to injured and displaced persons (see Appendix G, p. 200 for the names and locations of these facilities).

Cumulative highrise development proposed for the downtown area would increase the total number of persons working downtown. This would result in a greater demand for medical care and social services in the area if a disaster were to occur. In addition, street congestion would probably intensify due to the increased number of people concentrated in the Financial District. This would interfere with the prompt response of emergency vehicles due to route delays and detours caused by crowded streets.

The effectiveness of the City's emergency response plan would therefore depend, in part, on an informed public's ability to know what to do and where

- to go in the event of an emergency. The project sponsor has agreed to a mitigation measure which addresses this impact (see Section V. Mitigation Measures, p. 92).

NOTE - Emergency Response Plan

/1/ Tom Jenkin, Architect, Mayor's Office of Emergency Services, telephone conversation, January 12, 1982.

I. CULTURAL

"Although likely buried and/or disturbed during the past 200 years of historic construction, the possibility exists that prehistoric archaeological site deposits still remain below street level."/1/ If any artifacts were to be discovered during site preparation, the project sponsor has agreed to a mitigation measure to provide protection (see Section V. Mitigation Measures, p. 92).

The project site is on New Montgomery St., where several architecturally significant buildings are located./2/ Effects of the project on these buildings and the surrounding area are discussed in Section IV.A. Urban Design Factors, p. 30.

NOTES - Cultural

/1/ California Archaeological Site Survey, "Archaeological Records Search for 90 New Montgomery Street EIR in San Francisco," February 17, 1982.

/2/ Foundation for San Francisco's Architectural Heritage, 1979, Splendid Survivors

J. GROWTH INDUCEMENT

The project would add about 124,300 gross sq. ft. of office space to the Financial District of San Francisco and remove an existing two-story parking garage. Employment at the site would increase by about 505 persons. Office occupants are unknown but could include tenants who would relocate from other

IV. Environmental Impact

San Francisco locations, tenants who relocate from outside San Francisco, and new firms. The total increase in employment at the project site would not necessarily represent employment that is totally new to San Francisco.

The growth represented by the project would be in response to the continuing demand for office space in the Financial District of San Francisco. The project location reflects the trend toward meeting this demand south of Market St. This demand for office space continues the trend of growth in service sector and headquarters office activities and employment. This increase in office space and employment would contribute to continued growth of local and regional markets for goods, services and housing.

It is expected that many downtown workers would desire to live in San Francisco. However, increases in housing demand and City services would not correspond directly to employment growth, as some new jobs would be held by individuals who already live and work in the City, or who live in the City but who previously either did not work or worked outside the City, or by those who live in surrounding communities.

Any net increase in employment Downtown would increase the demand for retail goods and food services in the area. The project would intensify this demand, which would be met, at least in part, by retail space proposed to be incorporated in the project.

Increases in employment Downtown would also increase demand for business services, to the extent that the expanded space would not be occupied by firms providing those services (see Section IV.B., Bay Area Employment Multiplier Effects and Construction Employment). In response, demand would increase for existing space and possibly for further new development.

V. MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL IMPACTS OF THE PROJECT

HOUSING

● MEASURE PROPOSED AS PART OF THE PROJECT

- The project sponsor, Highfield Holdings, Inc., and California Jones Co. were together awarded 610 housing credits according to a January 27, 1982 agreement with the City and County of San Francisco signed by Dean Macris, Director of Planning. The agreement awards these credits on the condition that "the two firms make available \$2,440,000 to the City Housing Authority upon 60 days written notice from the Authority, not more than 90 days before commencement of construction. These funds would be used "to rehabilitate and convert units within the Yerba Buena Annex Housing Project from their current use and condition to residential units for senior citizens." (Quote from text of the January 27, 1982 agreement). The agreement allows Highfield Holdings, Inc. and California Jones Co. to assign or transfer their credits in compliance with the OHPP guidelines. Highfield was awarded 377 housing credits from this agreement, and it will apply 112 to help meet the housing demand generated by this project as calculated with the DCP formula.

TRANSPORTATION/CIRCULATION

MEASURES PROPOSED AS PART OF THE PROJECT

- Vehicle-activated visual signals (red and green lights) would be installed at both ends of the garage ramp, to prevent head-on conflicts between inbound and outbound vehicles on the one-lane ramp and to warn pedestrians on the sidewalk of the approach of outbound vehicles.

- The curb-to-curb width of Aldrich Alley would be increased to ten ft. for the length of the site to facilitate access to the enclosed loading dock. This would be done by the project sponsor pursuant to discussion (December 30, 1981) with the Department of Public Works.
- The project sponsor would submit a proposal to install a one-way sign at the west end of Aldrich Alley so that vehicles would not enter from Annie St. The project sponsor would pay for the installation of such a sign if approved by the Department of Public Works and the Board of Supervisors.

- The project sponsor would provide three parking spaces for bicycles, and one parking space for handicapped persons in order to decrease congestion caused by such persons (who may not have access to other modes of travel) searching for parking spaces.
- A transportation broker in the project management office would encourage transit use through the on-site sale of BART and Muni passes to employees, and by distributing transit information. The broker would provide a central clearinghouse for carpool information in cooperation with the non-profit RIDES for Bay Area commuters.
- The project would be designed to affix eyebolts to the building on the Mission St. facade for the suspension of Muni overhead trolley wires.
- - Project sponsors would comply with any legal measures adopted by the Board of Supervisors for funding of transit development and improvement to meet the peak transit demands caused by cumulative office development in the downtown area.
- - Upon completion, and with the help of the Department of City Planning, the project sponsors would encourage tenant firms to implement a flexible time ("flex-time") system for employee working hours (flex-time is designed to reduce peaks of congestion in the transportation system).

AIR QUALITY/CLIMATE

MEASURES PROPOSED AS PART OF THE PROJECT

- During excavation, unpaved demolition and construction areas would be sprinkled with water at least twice a day to reduce dust generation by about 50%.
- The general contractor would maintain and operate construction equipment in such a way as to minimize exhaust emissions.

V. Mitigation Measures

- The general contractor would use water-based or latex paints on all interior drywalls painted, rather than oil-based paints, which emit hydrocarbons while drying. This would reduce hydrocarbons from drying paint by about 60%.
- During construction, drivers of trucks in loading or unloading queues would turn off their engines when not in use to reduce vehicle emissions, except for trucks delivering concrete.

NOISE

MEASURE PROPOSED AS PART OF THE PROJECT

- The project contractor would muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment, where feasible.

MEASURE NOT INCLUDED AS PART OF THE PROJECT

- Holes for piles would be pre-augered, if possible, to reduce noise impacts. A decision would be made on the basis of the soils report, when completed.

UTILITIES AND PUBLIC SERVICES

MEASURES PROPOSED AS PART OF THE PROJECT

- The project would incorporate low-flow faucet and toilet fixtures to reduce water consumption and wastewater.
- The project would be equipped with a trash compactor to reduce the volume of solid waste requiring storage and the number of service trips to the site. Storage space for recyclable waste material containers would be provided for office use.

GEOLOGY, SEISMOLOGY, AND HYDROLOGY

MEASURES PROPOSED AS PART OF THE PROJECT

- A detailed foundation and geotechnical study has been conducted for the building by a licensed foundation and geotechnical consultant. The project sponsor would follow the recommendations of this study during the final design and construction of the project.

- The project would have a pile foundation, which would resist hazards such as liquefaction, subsidence, and unstable subsurface conditions (artificial fill). A pile foundation would also provide some measure of protection against seismic forces.
- Excavation pit walls would be shored up and protected from slumping or lateral movement of soils into the pit. Lagging and bracing of the existing basement would be used for this purpose. The contractor would comply with the Excavation Standards of the California Occupational Safety and Health Agency (Department of Industrial Relations).
- Should dewatering be necessary, subsidence in surrounding buildings and streets would be monitored by the project sponsor to insure that damage is kept to a minimum. Dewatering would cease should excessive subsidence occur. If the adjacent structure to the west at 650 Mission St. is supported on wet wood piles, a method would be devised to keep the piles moist during construction.
- During construction, the project contractor would sweep streets to prevent siltation of storm drains.
- Windows would be installed so as to minimize the possibility of breakage during an earthquake, and to maximize the possibility that glass would fall inward, rather than outward, should windows break.
- Nonstructural elements of the building, such as hanging light fixtures, bookcases, ceiling and wall partitions, and mechanical equipment would be attached firmly in a manner to reduce the likelihood of their falling during an earthquake.

ENERGY

MEASURES PROPOSED AS PART OF THE PROJECT

- Wherever possible, office suites would be equipped with individual light switches, fluorescent lights, and other energy-saving devices as appropriate to conserve electric energy.

- Building heating, ventilation, and air-conditioning (HVAC) systems would be maintained by the building management at the lowest rates consistent with code requirements and industry standards to reduce heating and cooling loads.
- The project sponsor would install sun-control devices on the interiors of the windows to reduce solar heat gain.
- The project sponsor would install solar grey glass in windows to reduce solar heat gain.
- Elevators would use solid-state motor controllers to conserve energy when elevators are at rest.
- The project architect and project engineer would meet with the Bureau of Energy Conservation of the Public Utilities Commission during the design development phase of the project to discuss measures that could be taken to conserve energy.
- - One year after full occupancy of the structure, actual energy consumption data from Pacific Gas and Electric Company (PG&E) monthly billings shall be reported to the Department of City Planning. If building energy consumption exceeds applicable state standards in effect at the time of issuance of the Building Permit, an energy audit shall be performed by PG&E or another qualified auditor, and an energy management program, including consideration of possible retrofit measures, shall be developed and implemented to reduce energy consumption.
- - The project sponsor would insure that average installed lighting levels do not exceed 2.0 watts per sq. ft.

MEASURES NOT INCLUDED AS PART OF THE PROJECT

- Within 18 months of full occupancy, the building operator could provide the Department of City Planning with monthly natural gas and electricity consumption data for a 12-month period. These data would then be adjusted for differences between the building's operation and Title 24-assumed operating conditions. If the resulting data were to show that the project's energy consumption exceeded Title 24 energy conservation standards, the building operator could have the building's energy performance audited by PG&E (or another certified contractor), and if economically feasible, cost-effective energy conservation measures could be implemented. This measure could be adopted by the project sponsor if an agreement with the City on the basis for determining cost-effectiveness of recommended conservation measures can be reached.
- - The project sponsor is evaluating the installation of photoelectric controls in areas where daylight would have a significant impact on interior light levels. A photocell, connected to the double level switching required by Title 24, would reduce artificial light levels to half when daylight supplemented the light levels sufficiently. Photocells would be installed if they are determined to be economically feasible.

- The project sponsor has rejected the installation of a solar water heating system to reduce natural gas consumption. The rooftop area is too small to accommodate solar panels in addition to the ventilation louvres for the mechanical equipment.
- The project sponsor has rejected using PG&E's steam heating district because of its high operating costs compared to those of natural gas heating.
- The project sponsor has rejected the use of openable windows because they allow high air infiltration rates that increase heating and cooling loads, and because of the lack of adequate particulate filtration with this type of ventilation.

EMERGENCY RESPONSE PLAN

MEASURES PROPOSED AS PART OF THE PROJECT

- The project sponsor/building management staff would consult with the Office of Emergency Services (OES) in developing their plans to ensure coordination with the City's emergency response plan. The project plan would then be reviewed by the OES before issuance of the final occupancy permits by the Department of Public Works.
- The project sponsor would provide information to building occupants concerning what to do in the event of a disaster to expedite implementation of the City's emergency response plan.

MEASURES NOT INCLUDED AS PART OF THE PROJECT

- In cooperation with OES, the project sponsor would consider providing survival provisions, such as blankets and bottled water, on the site. A decision would be made after consultation with OES.

- An evacuation and emergency response plan would be developed by the project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services, to insure coordination between the City's emergency planning activities and the project's emergency plan and to provide for building occupants in the event of an emergency. The project's plan would be reviewed by the Office of Emergency Services and implemented by building management before issuance by the Department of Public Works of final occupancy permits.

CULTURAL

MEASURES PROPOSED AS PART OF THE PROJECT

- Should evidence of cultural or historic artifacts of significance be found during project excavation, the Environmental Review Officer and the President of the Landmarks Preservation Advisory Board would be notified. The project sponsor would select an archaeologist or other expert to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, could be implemented to preserve or recover such artifacts. The Environmental Review Officer would then recommend specific mitigation measures, if necessary, and recommendations would be sent to the State Office of Historic Preservation. Excavation or construction which might damage the discovered cultural resources would be suspended for a maximum of four weeks to permit inspection, recommendation and retrieval, if appropriate.

VI. Significant Environmental Effects

- VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

- TRANSPORTATION

- The loading dock in combination with the parking garage would generate traffic in Aldrich Alley, thereby increasing pedestrian-vehicle conflicts on the New Montgomery St. sidewalk.

VII. ALTERNATIVES TO THE PROPOSED PROJECT

A. NO PROJECT

This alternative would entail no physical change to the project site as it now exists. The parking garage would remain, presumably in the same condition that exists in 1982.

In general, the environmental characteristics of this alternative would remain substantially as described in Section III of this report. Present levels of traffic, parking demand, transit demand, air pollution, noise, energy consumption, on-site employment, and wind, shadow and visual effects now attributable to the building on the site would continue to exist.

This alternative would lessen employment-related effects identified in Section IV.B., p. 51, as approximately 505 fewer people would be employed at the project site than are proposed.

This alternative was rejected by the project sponsor because it would not fully utilize the potential usable space allowed at the site and would fail to provide a reasonable return on the investment potential of the site.

B. MISSION STREET LOADING DOCK ALTERNATIVE

This alternative would provide a loading dock with access from and egress to Mission St. (see Figure 23, p. 101). An enclosed dock, recessed about 37 ft. from the Mission St. property line, would be provided off Mission St. at the western side of the project. The 15-ft.-wide stall would be entered by a backing maneuver from Mission St., which would momentarily block vehicles in the diamond (transit vehicle) lane. The stall would be deep enough to accommodate the largest single-unit trucks.

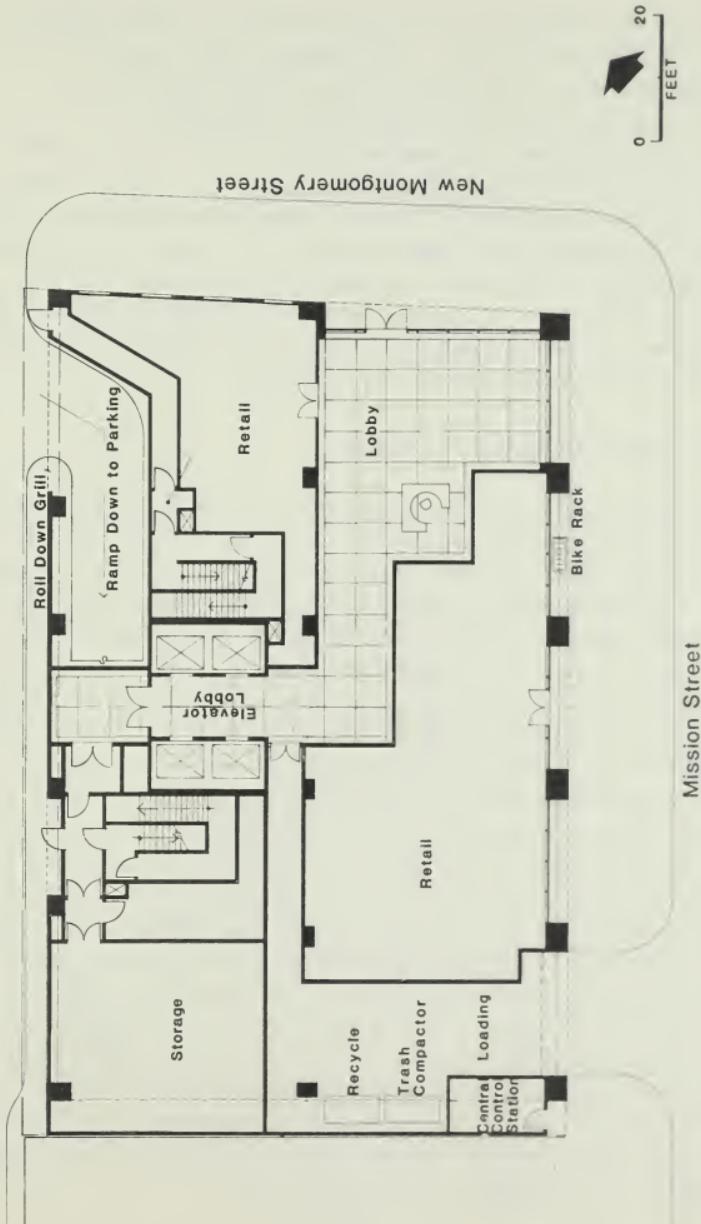


FIGURE 23: Mission Street Loading Dock Alternative

This loading dock configuration would reduce traffic in Aldrich Alley as compared to the proposed project. There would be fewer potential pedestrian-vehicle conflicts because there are fewer pedestrians on Mission St. at this location than there are on New Montgomery St. The loading area could be made deeper to accommodate tractor-trailer rigs, but their maneuvering would block traffic lanes as well as transit lanes on Mission St. This alternative did not receive favorable comments from Department of City Planning transportation staff members because of its impact on transit and traffic operations on Mission St. and because of its conflict with the Transportation Element of the Master Plan which encourages access from minor alleys rather than major streets, especially transit streets. Because of this, the project sponsor rejected this alternative.

C. PASS-THROUGH LOADING DOCK ALTERNATIVE

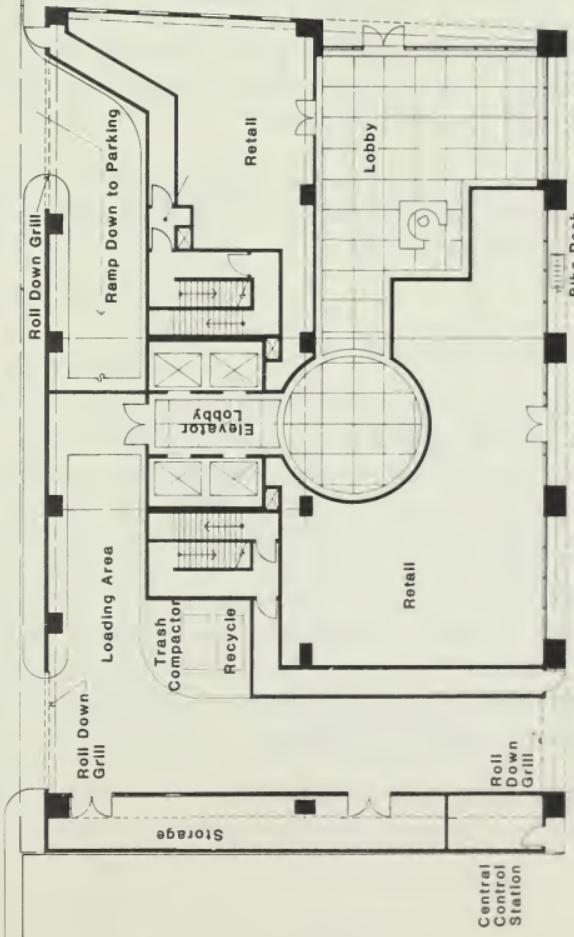
This alternative would provide a loading dock with a pass-through driveway from Aldrich Alley, through the building, to Mission St. (see Figure 24, p. 103). Access to the enclosed loading stall would be made somewhat easier because some vehicles could be driven in from Aldrich "head first," avoiding the compound backing maneuver from the narrow 7.5-ft. section of Aldrich west of the site. Vehicles with an outer turning radius of about 25 ft., such as cars, light vans and light trucks, could make this approach to the loading area easily. The driveway through to Mission St. would have about a 13-ft. width and a 13-ft. curbcut at the exit across the Mission St. sidewalk. Mission St. pedestrian traffic is light at this location. Use of the driveway and access to the loading space could be controlled, as roll down grills would be provided at each end. Trucks such as cross-country moving vans, which would be too large to enter Aldrich Alley, could then be permitted to back in to the driveway from Mission St. With this alternative, conflicts between trucks and vehicles serving the project and Mission St. traffic, particularly in the transit lane, could be minimized, as compared to such conflicts resulting from the Mission St. loading dock alternative. The Master Plan encourages loading access from minor alleys such as Aldrich rather than thoroughfares, especially transit streets, such as Mission. Therefore, this alternative also conflicts with the Transportation Element of the Master Plan and did not receive favorable comments from the transportation staff members; consequently, it was rejected by the project sponsor.

Aldrich Alley

NEW Montgomery Street

Mission Street

0 20 FEET



SOURCE: Gensler and Associates

FIGURE 24: Pass-Through Loading Dock Alternative

D. NO-PARKING ALTERNATIVE

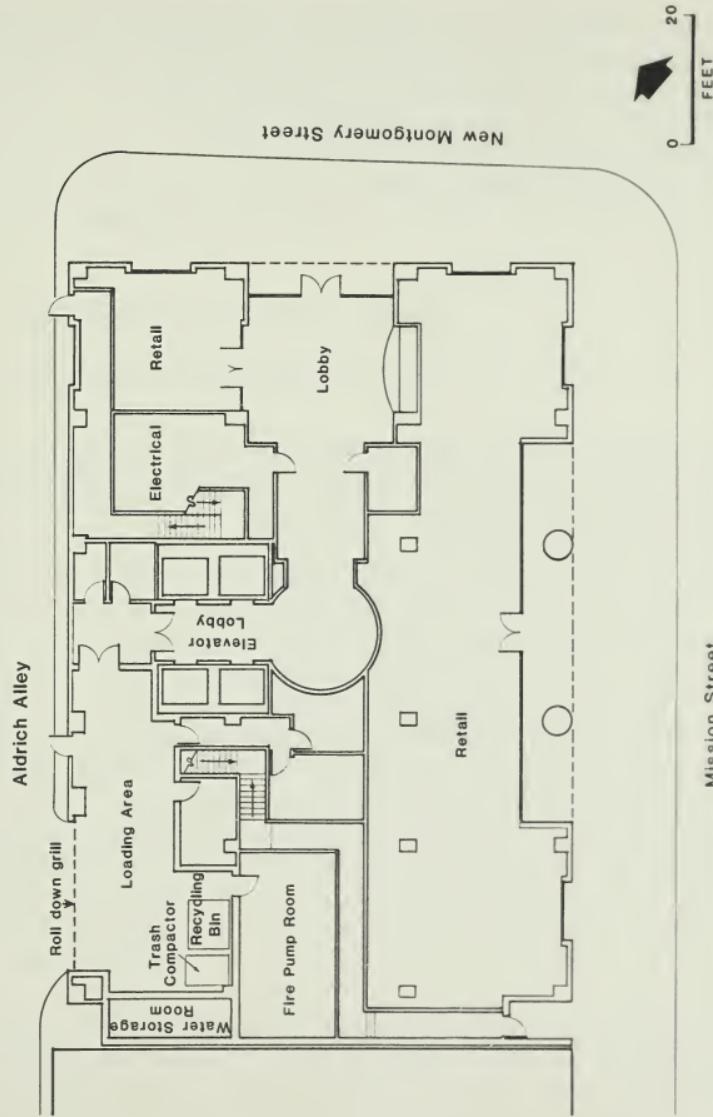
The No-Parking alternative would not provide the 23-space parking garage in the basement level of the proposed project. This alternative would reduce the number of vehicle trips to the site and would reduce project-induced vehicle-pedestrian conflicts at the Aldrich Alley curb cut on New Montgomery St. It would eliminate the need for the one-lane ramp into the basement area and the potential for vehicle-vehicle conflict on the ramp. It would eliminate the need for use of subsidewalk space by the project. (If subsidewalk space were not used, providing parking on the site would not be feasible.) It would increase the demand for parking spaces off site, and the demand on public transit. This alternative would discourage use of private autos for commuting to an area which is congested.

- This alternative would be consistent with the Comprehensive Plan in that no long-term parking would be provided on the site. This alternative is the preferred choice of the project sponsor.

E. HOUSING PROVIDED ON THE SITE ALTERNATIVE

Retaining the maximum office space provided by the project, up to 20 studio apartments could be added on two floors. This could be permitted as a conditional use based on bonus floor area of 10,000 sq. ft. for a second building entrance fronting on Mission St., approximately 2,500 sq. ft. for proximity to the Montgomery Station of the Market St. subway used by Muni and BART, and approximately 80 sq. ft. for widening of a part of the New Montgomery St. sidewalk. Five parking spaces would have to be allocated for the residential use at the required rate of one parking space for each four units in the C-3-O district. This alternative would add transportation, service, and energy impacts on the site engendered by up to 40 residents, assuming an occupancy of two persons per unit.

This alternative is considered by the project sponsor to be physically and economically infeasible as the small size of the site would preclude the



SOURCE: Gensler and Associates

● FIGURE 24A: No Parking Alternative

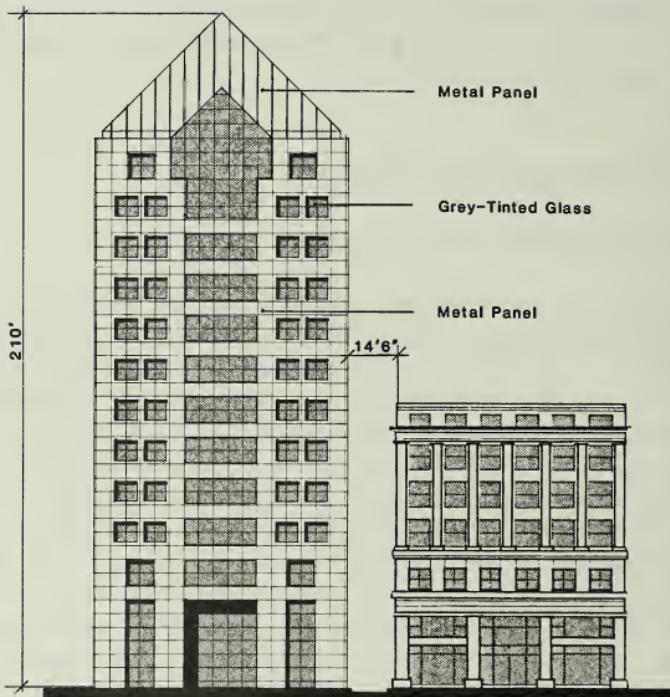
provision of a separate lobby and elevators for the apartments, and the number of floors to be served would be too limited for an efficient use of such services. Provision of required on-site open space (720 sq. ft.) and a required 30 ft. rear setback would result in small units. This alternative has been rejected by the sponsor as it is intended to provide housing elsewhere in the City in accordance with an agreement between the sponsor and the City, dated January 27, 1982.

F. GUIDING DOWNTOWN DEVELOPMENT ALTERNATIVE

1. OFFICE BUILDING WITHOUT HOUSING ON-SITE

This alternative would be a building designed to meet the criteria outlined in Guiding Downtown Development (GDD), published in May 1981 by the Department of City Planning. If the recommendations of GDD were adopted, the permitted FAR would be 12:1. An additional 0.5:1 FAR could be obtained for the provision of retail space on the street level. This would result in a total floor area of 122,500 gross sq. ft. A building covering all of the site for the first three floors (29,400 sq. ft.) and set back five ft. from the west property line at the upper levels could accommodate an additional 10 floors of 8,900 sq. ft. each. The resultant project would have 13 floors and 118,400 sq. ft. (see Figure 25, p. 106). As the FAR is the principal design constraint, the building height would be approximately 200 ft. where 500 ft. would otherwise be allowed. (An additional FAR of 3:1 could be gained by the transfer of development rights if a building of architectural or historical significance elsewhere in the C-3-O District were preserved. This has not been proposed by the project sponsor. If it were, however, it would result in an allowable FAR of 15.5:1 and would allow a building of 151,900 gross sq. ft. approximately 16 stories high.)

Parking might be provided as an accessory use in a manner similar to that in the project as proposed. Loading would be provided in a manner similar to that proposed for the project if the 12.5:1 FAR were used. (Two loading spaces would be required if the floor area bonus for the transfer of development rights were used.) Access would be from Mission St. to a private



0 40
FEET

FIGURE 25: Guiding Downtown Development Alternative

SOURCE: Gensler and Associates

service driveway, not less than 24 ft. in width, capable of handling trucks 40 ft. in length. This would require a different ground level design which would reduce the extent of retail space on the 9,800 sq. ft. ground level. As it is not anticipated that a transfer of development rights would be obtained for this project, the details of this two-dock alternative have not been designed by the project architect. Regulations proposed by GDD would give access preference to minor streets and alleys rather than to transit preferential streets.

Recreation and open space at the rate of one sq. ft. for each 25 gross sq. ft. of office space would have to be provided off-site at an undetermined location. Approximately 4,300 sq. ft. would be required for this purpose. Art work in the form of sculpture, paintings, mosaics, or tapestries would be provided in the lobby area in compliance with the requirement that such works of art costing one percent of the total construction costs be included. Bas-reliefs or mosaics might also be provided on the exterior of the building at the pedestrian level. One tree per 20 ft. of frontage would be provided on the sidewalk or setback. This requirement could be waived or modified by the Zoning Administrator if the trees would interfere with pedestrian or vehicular traffic or public utilities.

Because of the small size of the parcel, no setbacks would be required at the upper levels, and none would be provided except on the west side in order to provide windows. Required housing would be provided off-site.

A GDD-proposed amendment to Section 244.3 of the Planning Code would require the following feature applicable to this project:

Street frontages of new buildings on sites immediately adjacent to significant and contributory buildings shall generally reflect the relative ratio of solid area to glazing, window proportions, important building lines and impression of weight and mass of the adjacent building structure, up to a height equivalent to the bases defined on the adjacent building.

Figure 25, p. 106, will aid in judging whether this provision would be met by the GDD alternative.

The building would be similar to the project as proposed but would be two stories lower and smaller by 13,000 sq. ft. Impacts identified for the project as proposed would be proportionately reduced.

2. OFFICE BUILDING WITH HOUSING ON-SITE

If the housing bonus floor area ratio of 5:1 were utilized, up to 60 units of housing, averaging 800 sq. ft., could be provided on-site in approximately five floors. This would result in a building of 18 or 19 stories. Shadow effects would increase. Provision of an apartment lobby and elevators would reduce the amount of retail space available on the street level. Provision of housing on-site has been rejected by the project sponsor for the reasons cited in Alternative E above.

● G. EIGHTY-FOOT-HIGH CONCRETE BUILDING ALTERNATIVE

An alternative of the same height as the adjacent Call Building, and with building materials similar to those of the Call Building, would be a structure of precast concrete about eighty feet in height. This alternative would include a symmetrical arrangement of the New Montgomery St. pedestrian-level features, including the entranceway on New Montgomery St. The building would be built up to the lot lines and contain about 9,800 sq. ft. per floor. It would provide retail uses, the building lobby, and the loading dock on the ground level; it would provide five levels of office space with a total of 49,000 gross sq. ft. The structure would be about 85 ft. high plus a mechanical penthouse.

It would eliminate new shadow effects on the Garden Court of the Sheraton Palace Hotel and reduce shadow effects on New Montgomery St. About 210 people would be employed at the site. It would reduce the effects resulting from the number of people employed at the site by approximately 60%.

This building would be more similar in size and appearance to its immediate post-Earthquake neighbors -- the Call Building and the Crossley Building on the opposite side of New Montgomery St., but less compatible with the 26-story

Telephone Building at 140 New Montgomery St. and the proposed highrise building to be known as One New Montgomery Place, if it is built.

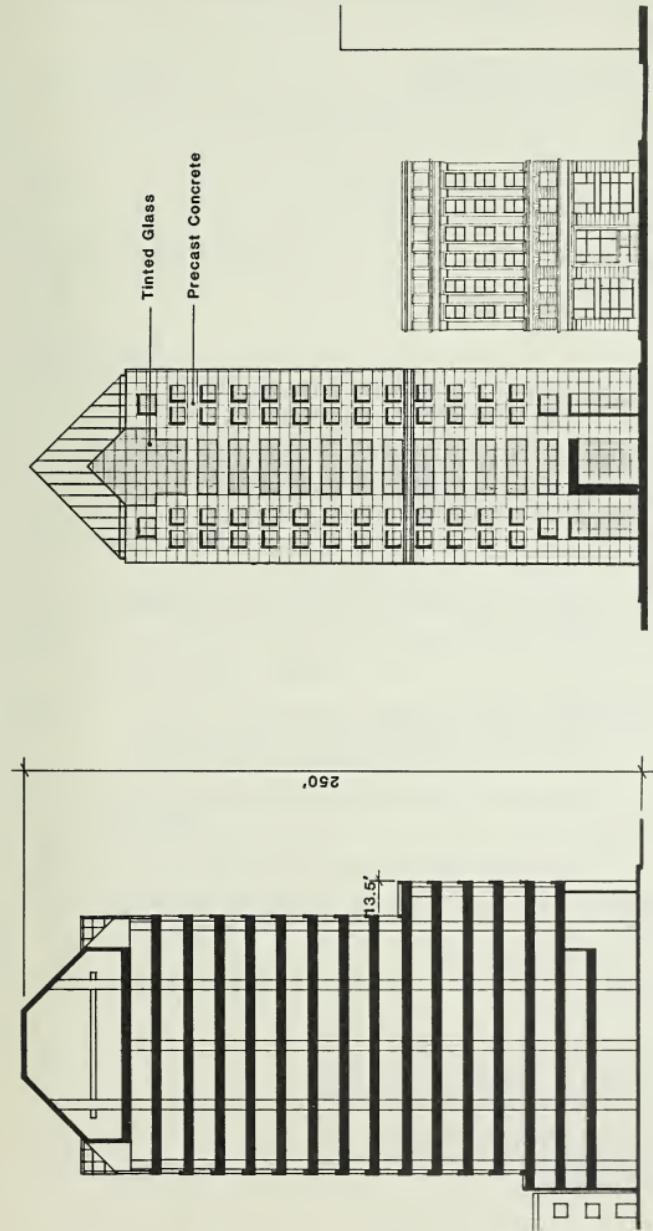
This alternative has been rejected by the project sponsor since the objective of the project is to provide the maximum amount of office space which the site can accommodate and to make a reasonable return on the sponsor's investment.

● H. BUILDING WITH SETBACK AT THE HEIGHT OF THE CALL BUILDING

This alternative would be a building with a setback on the New Montgomery facade aligned with the height of the Call Building (see Figure 25A, p. 109a). The structure would be precast concrete with fenestration the same as is currently proposed. Levels one through seven would be the same as the project; office levels 8 through 15 would be set back 13.5 ft. from the New Montgomery St. sidewalk. The reduction in floor area on levels 8 through 15 would allow the addition of level 16 for office use. This alternative would contain approximately 132,950 gross sq. ft. of floor area, 2,550 sq. ft. less than the proposed project. Building height would increase 12.5 ft. to a total height of 252.5 ft.

This alternative would increase the length and duration of shadows cast by the building on the Sheraton Palace Garden Court. Other environmental impacts of this alternative regarding employment, housing, and fiscal factors, transportation, air quality, construction noise, geology, energy, and growth inducement would be similar to those described in Section IV., Environmental Impact, pp. 29 - 91.

The project sponsor feels that the setback alternative is inappropriate for New Montgomery St. since no buildings on the street have a similar setback, including the much taller Pacific Telephone Building. Leasability and tenant planning flexibility would be adversely affected by the less efficient and smaller upper floors (7,850 sq. ft. vs. 8,900 sq. ft.). Therefore, the sponsor has rejected this alternative.



New Montgomery Street Elevation

0 40
FEET

Mission Street Elevation

SOURCE: Gensler and Associates

● FIGURE 25A: Alternative with Setback at the Height of the Call Building

VIII. SUMMARY OF COMMENTS AND RESPONSES

<u>TABLE OF CONTENTS</u>	<u>Page</u>
A. INTRODUCTION	112
B. LIST OF PERSONS COMMENTING	113
C. COMMENTS AND RESPONSES	114
URBAN DESIGN FACTORS AND SHADOWS	114
<u>Landmarks</u>	114
<u>Urban Design</u>	114
<u>Shadows</u>	118
LIST OF PROJECTS INCLUDED IN CUMULATIVE ANALYSIS	119
EMPLOYMENT, HOUSING AND FISCAL FACTORS	129
<u>Cumulative Housing Demand, Household Distribution</u>	129
<u>and Developer-Sponsored Housing</u>	129
<u>Rental Housing</u>	134
<u>Transit Costs and Funding</u>	139
TRANSPORTATION	144
<u>Cumulative Impacts</u>	144
<u>Muni</u>	146
<u>Parking</u>	146
OPERATIONAL AIR QUALITY	148
ENERGY	150
DOWNTOWN EIR	153
MITIGATION MEASURES	154
<u>General</u>	154
<u>Housing</u>	155
<u>Transportation</u>	156
<u>Air Quality</u>	160
ALTERNATIVES TO THE PROPOSED PROJECT	161
<u>Alternative G</u>	161
<u>(New) Alternative H</u>	162
D. STAFF-INITIATED CHANGES	164
<u>Project Change to No-Parking Alternative</u>	164
<u>Traffic Impact of Cumulative Development</u>	165
<u>Energy</u>	169
<u>Significant Environmental Effects</u>	170
<u>Distribution List</u>	170
<u>Typographic Errors</u>	170

VIII. Summary of Comments and Responses

List of Figures

	<u>Page</u>
12A. New Montgomery St. Frontage.	117
25A. Alternative with Setback at the Height of the Call Building. .	163
24A. No Parking Alternative	166

List of Tables

2. Relationship Between Applicable Urban Design Policies of the San Francisco Comprehensive Plan and the Proposed Project. . .	115
B-1. Major Office Building Construction in San Francisco through 1981, in Gross Square Feet	122
C-7. Cumulative Office Development in Downtown San Francisco as of August 6, 1982	125
C-8. Gross Square Feet of Cumulative Office and Retail Development in Downtown San Francisco as of August 6, 1982	128
B-2. Projected Effects of Downtown Office Development on Regional Housing Markets, 1982-90	131
R-to-C 1. Projects with Housing either on site or agreed to by developers to construct off site as per approval resolution and negotiation with DCP.	133
C-6. Anticipated Office Development within a 2,000-foot Radius of the Site.	145
5. Projected Local Curbside Carbon Monoxide Impacts*.	149
3a. Comparisons of Land-Use and Employment Trend Approaches . . .	168

VIII. Summary of Comments and Responses

A. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (DEIR) prepared for the proposed 90 New Montgomery Street Building, and responses to those comments.

All substantive spoken comments made at a public hearing before the City Planning Commission on June 24, 1982, and all written comments received during the public review period from May 21, 1982 through June 24, 1982, have been reviewed and are presented herein by direct quotation, edited to omit repetition and nonsubstantive material only.

Comments and responses are grouped by subject matter and are generally arranged by topics corresponding to the Table of Contents in the Draft EIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of comments under that topic. As the subject matter of a topic may overlap that of other topics, the reader must occasionally refer to more than one group of Comments and Responses to review all information on a given topic. Where this occurs, cross-references are provided.

These comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated into the Final EIR, as indicated in the responses herein.

B. LIST OF PERSONS COMMENTING

Susan Bierman - letter
City Planning Commissioner

Eugene Kelleher
City Planning Commissioner

Yoshio Nakashima
Vice President, City Planning Commission

Jonathan Malone
Secretary, Landmarks Preservation Advisory Board

Carl Imperato
San Franciscans for Reasonable Growth

David Jones

Flint Nelson - letter
Director, Bureau of Energy Conservation, Public Utilities Commission

C. COMMENTS AND RESPONSES

URBAN DESIGN FACTORS AND SHADOWS

Landmarks

COMMENT

Jonathan Malone: "On Page 17, the discussion of environmental setting should include a notation that the Garden Court of the Sheraton Palace Hotel is designated Landmark No. 18."

RESPONSE

The following has been added at the end of the second paragraph on p. 17 in the EIR: "The Sheraton Palace Hotel, north of the Call Building, is an A-rated building whose Garden Court has been designated as City Landmark No. 18."

Urban Design

COMMENTS

Commissioner Bierman: "Page 19, last sentence, first paragraph. It may be true [that the] parking structure weakens visual cohesiveness. However, it may not weaken it as much as a tall building will weaken it, disrupt the cohesiveness."

Vice President Nakashima: "According to the project as described in this document, I guess I would dispute all the analysis on Page 32 in that I don't believe that this project meets any of the policies of major new development. And I don't believe that it promotes harmony. I believe that there is an extreme contrast to neighboring projects in that it is going to be the tallest building in the neighborhood and that the bulk is also out of scale as presently proposed."

RESPONSE

The tallest building on New Montgomery St. is the 436-ft.-high Pacific Telephone Building, 140 New Montgomery St., in the next block to the south (see Figure 10, p. 33 and Figure 12, p. 35); it is 196 ft. taller than the project. The 440-ft.-high Foremost McKesson Building is located at One Post St., opposite the north end of New Montgomery St., one block north of the project site.

The text of the Urban Design Table (pp. 31-32) has been revised to reflect the comments of the Planning Commissioners. Changes in the text are underlined as shown on the following two pages:

VIII. Summary of Comments and Responses

COMPATIBILITY WITH THE URBAN DESIGN ELEMENT OF THE COMPREHENSIVE PLAN

The Urban Design Element of the San Francisco Comprehensive Plan provides a basis in City policy for the following summary of the urban design implications of the proposed project (see Table 2).

TABLE 2: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE SAN FRANCISCO COMPREHENSIVE PLAN* AND THE PROPOSED PROJECT

APPLICABLE URBAN DESIGN POLICIES

A. Policies for City Pattern

1. Policy 3 - "Recognize that buildings, when seen together, produce a total effect that characterizes the City and its districts." (p. 10)

RELATIONSHIP OF PROJECT TO APPLICABLE POLICIES

The project would join a number of other comparably sized relatively recent highrise buildings in the downtown area. Collectively, these buildings provide the major visual identification for the central business district. The project would be visible in views of the skyline from the south, and together with other south of Market St. highrise structures, would define the southern edge of the Financial District (see Item C-3, p. 32 and Figure 10, p. 33).

B. Policies for Conservation

2. Policy 6 - "Respect the character of older development nearby in the design of new buildings." (p. 25)

The project would be higher than adjacent buildings but in other respects would be similar in scale (see Figure 11, p. 34). Its facade would be of precast concrete with a heavy aggregate, appearing similar to older neighbors. Its corner windows would be recessed eight to twelve inches in a manner similar to the Call Building. Details on the project's base would relate to the street-level proportions of older buildings nearby. Horizontal cornice lines at the third level of the project would line up with the cornice of the adjacent Call Building. The recessed central entrance would repeat the central entrance design of the Call Building and other buildings on New Montgomery St.

TABLE 2: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE SAN FRANCISCO COMPREHENSIVE PLAN* AND THE PROPOSED PROJECT (Continued)

C. Policies for Major New Development

3. Policy 1 - "Promote harmony in the visual relationships and transitions between newer and older buildings." (p. 36)

See Items A-1 and B-2, p. 31. The project would provide a link between the 440-ft.-high Foremost McKesson Building at One Post St. (opposite the northern end of New Montgomery St.) and the 436-ft.-high Pacific Telephone Building at 140 New Montgomery St. (in the block south of the project site), as shown in Figures 12 and 12A, p. 35 and 35a. The sloped roof would be similar to the roofs of such nearby buildings as the Hobart Building at 582 Market St., the Citizens Savings Building at 704 Market St., and the Hunter-Dulin Building at 111 Sutter St.

4. Policy 2 - "Avoid extreme contrast in color, shape, and other characteristics which will cause buildings to stand out in excess of their public importance." (p. 36)

The project would be light in color in keeping with adjacent buildings. The rectilinear shape of the building would be similar to the shapes of nearby older development, although the building would be taller than the adjacent Call Building. The sloped roof would be similar to several nearby older buildings (see Item C-3 above and Figure 10, p. 33). The building facade would consist of precast concrete panels which would provide a surface texture compatible with adjacent buildings.

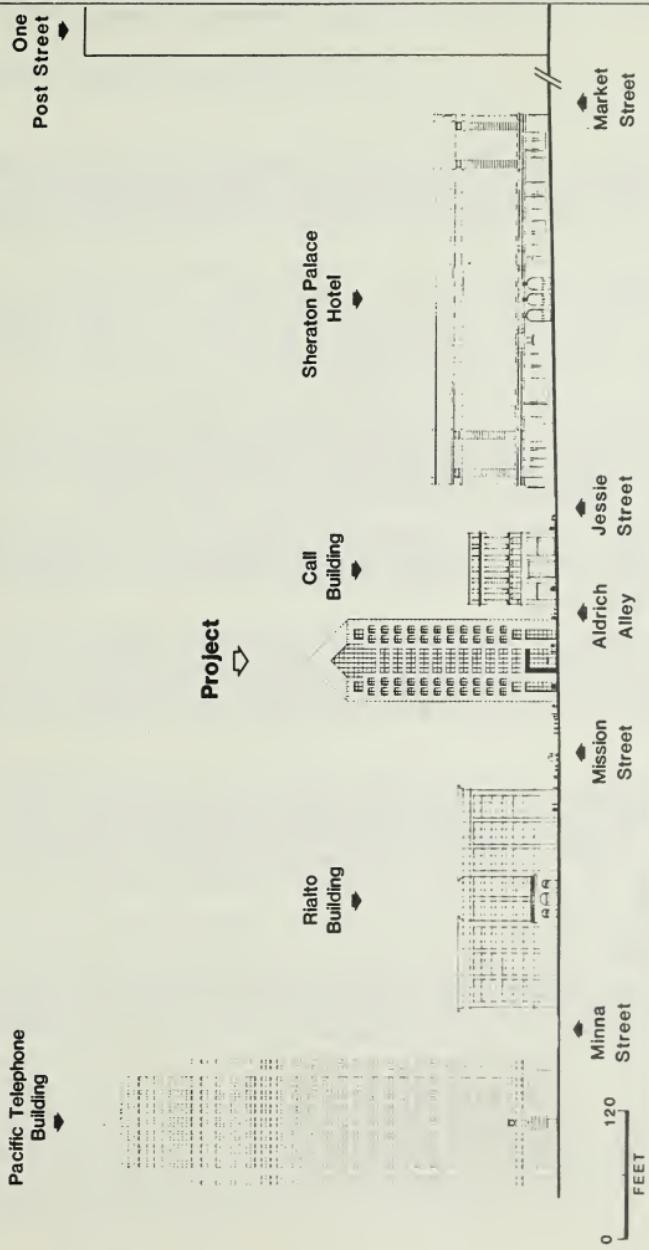
5. Policy 5 - "Relate the heights of buildings to important attributes of the City pattern and to the height and character of existing development." (p. 36)

See Items A-1 and C-3 above. The project would be taller than neighboring low-rise and mid-rise development. At 240 ft., the project would be the tallest building on New Montgomery St. between the 436-ft. Pacific Telephone Building and the 440-ft. Foremost McKesson Building.

6. Policy 6 - "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." (p. 37)

See Items A-1 and B-2, p. 31, and C-3, p. 32. The bulk of the project would be similar in scale to the prevailing scale of existing development nearby.

*Department of City Planning, 1971, Urban Design Element of the Comprehensive (Master) Plan. Page references to the Plan are shown in parentheses.



SOURCE: Gensler and Associates

FIGURE 12A: New Montgomery Street Frontage

VIII. Summary of Comments and Responses

Shadows

COMMENT

Commissioner Bierman: "P. 173. Was the Palace Hotel notified and sent a copy of the EIR? Were they [the Palace Hotel] notified of shadow effects on the Garden Court? Has Landmarks been consulted on shadowing of [the Garden] Court?"

RESPONSE

An ESA staff member toured the Garden Court and the roof of the Sheraton Palace Hotel with the hotel building engineer and gathered information so that he could prepare the drawings with dimensions for the shadow analysis.

The notice of availability of the DEIR and the public hearing to receive comments on the DEIR was published in the San Francisco Progress on May 21, 1982 and was posted in at least three locations on or near the site. The Sheraton Palace Hotel did not request a copy.

A copy of the DEIR was mailed to the manager of the Sheraton Palace Hotel on July 1, 1982. No comments have been received from the management of the Hotel. The hotel manager has been added to the Distribution List on p. 176 of the EIR.

The Landmarks Preservation Advisory Board members received copies of the DEIR and discussed the project at their meeting on June 23, 1982.

Jonathan Malone, Secretary to the Landmarks Preservation Advisory Board, commented for the Board at the public hearing on the DEIR on June 24, 1982.

COMMENT

Jonathan Malone: "On Page 36, there seems to be an error in calculation in the amount of shadowing that would take place over the Garden Court of the Sheraton Palace. On Page 36 the calculation says that this shadowing would last from about ten minutes to a maximum of two hours. On Page 37, the time that they list actually works out to be a period of a maximum of two and a half hours."

RESPONSE

The last sentence of the third paragraph on p. 36 has been changed to read: "New shadows cast by the project would advance and recede, lasting from about ten minutes to a maximum of about two and one-half hours."

LIST OF PROJECTS INCLUDED IN CUMULATIVE ANALYSIS

COMMENTS

Carl Imparato: "As a courtesy to the Commission, I would ask . . . that my testimony from the transcript of 1049 Market Street EIR [which is pertinent to this EIR] be incorporated into the comments and references with the appropriate page numbers and all the particulars changed.

"In analyzing the cumulative impacts on transit, housing, air quality -- the whole bunch, a more realistic, much higher level of downtown development should be used. And we've submitted . . . a reasonable list of projects that are under consideration. . . .

"That list . . . identifies about 39 million square feet of downtown area development which is in the pipeline or completed in the last year. . . . But this Draft EIR on Page [53] claims that only 9.8 million square feet of office space is the appropriate level of development to look at for cumulative analysis. That number is far too low. It is much less than 39 million square feet we've got on this list. It is inconsistent with the 12.8 million square feet referred to in the Montgomery/Washington final EIR. It is inconsistent with the 18.6 million square feet noted on Page A53 of the Welsh Commons Draft EIR last week. It is inconsistent with the Mayor's statement that there's 26 million square feet of downtown projects in the works. She made that statement last year.

"We put this list together in January, and I am sure there are new project proposals since then, so there's probably 14 million square feet in the pipeline. So it is deceptive to underestimate the magnitude of the problems. You are underestimating the magnitude of cumulative impacts by a factor of four in this Environmental Impact Report.

"Now, the projects on our list are not pie in the sky projects. CEQA clearly mandates that cumulative impacts analysis should not be limited just to projects that are already approved. CEQA states that the project's impacts must be viewed in connection with . . . 'the effects of past projects, the effects of other current projects, and the effects of probable future projects.' That's Public Resources Code Section 21083(b).

"Now, limiting the cumulative impact analysis to only include future projects which are well into the design stage, for which you know what color they plan to make the facade, that clearly conflicts with the intent of the cumulative analysis provisions of state law. What we really need to do with the cumulative impact analysis is estimate the impacts which would occur because of the development.

"Now the projects on our list have approximate square footages. . . . The design plans are incomplete for some of the proposed projects. . . . But those factors are really not that substantial from the standpoint of cumulative analysis. It doesn't matter what color the building is going to be, because all we really need to know for the impacts on parking, transit, air quality, housing, transportation, public services -- all we need to know is an estimate of the square footages, because the impacts are all proportional to square footages.

"Now, the gross impacts on all these areas are basically independent of the specific locations of the proposed development, whether it's Montgomery Street, China Basin. It's independent of the setbacks -- the facades. It is a function of total number of office workers. So, therefore, we would request that you perform a cumulative analysis based on 39 million square feet on this list here. . . .

"The cumulative impact analysis should compare the base case -- that's today, June 1982, to the base case plus cumulative impact, plus cumulative development. Those two sets of data should be compared side by side to give a simple, clear understanding to the public.

"You don't compare the two quantities of existing and proposed development and then existing [and] proposed plus the project and just leave those two columns in the EIR, because then you don't know what's going on today and you really have no idea of what the cumulative development looks like.

"There is a reference on Page 60 . . . to a list called "Cumulative Housing Demand List." . . . So I would ask [that] that sort of list be incorporated in the Final EIR and future Draft EIR's. Also, the list of projects that are used in cumulative analyses."

David Jones: "My comments on the [1049 Market Street] EIR regarding the sections of the California Environmental Quality Act and the sections of the guidelines for CEQA, which state what type of list is required for cumulative impact analysis, are also entered into testimony on this [EIR]."

"Section 15023.5(c) of CEQA guidelines state: 'The following three elements are necessary to an adequate cumulative impact discussion:

'1. A list of projects producing related or cumulative impacts, including those projects outside the control of the agency.

'2. A summary of the expected environmental effects to be produced by these projects.

[']3. A reasonable analysis of the cumulative impacts of the relevant projects.'"]

"Section 21083 of the law states, 'As used in this subdivision, "cumulatively considerable" means that the incremental effects of . . . past projects, the effects of other current projects, and the effects of probable future projects' is included.

"So the statement of the people before me, that the EIR, that this EIR should have a cumulative impact analysis, and it should be based on the list of recently constructed projects, projects under construction, projects approved by the Planning Commission, and projects under formal review, is not just something they came up with. It is clear from the definition of 'cumulative impacts' in both the CEQA guidelines and the law -- the EIR cannot neglect these cumulative impacts, and it must analyze these impacts.

VIII. Summary of Comments and Responses

"Just because the project itself is small does not mean the Planning Commission decides to exempt it from requirements of the California Environmental Quality Act.

"I would like to provide a list which we have prepared with the number of projects under formal review, number of projects under construction, number of projects approved, number of projects completed in 1981. I would like to see this list [used] in the EIR and for environmental impacts to be based on that list. If it is in any way deficient . . . I would like [it] to be updated by the Department of City Planning and made accurate."

RESPONSE

Table B-1, p. 183 in the EIR has been replaced with an updated table (see Table B-1, p. 122 in this document).

The first paragraph in the discussion of LOCAL AND REGIONAL COMMERCIAL SPACE AND EMPLOYMENT, p. 19, has been replaced with this new paragraph to reflect the updated information:

"San Francisco is the major office center in the Bay Area, with approximately 57.2 million gross sq. ft. of office space at the end of 1981./1/ Approximately 32.3 million gross sq. ft. were constructed between 1960 and 1981 (see Appendix B, Table B-1, p. 183) in downtown San Francisco. In the 1960s, the amount of office space constructed averaged about 1.1 million gross sq. ft. per year. During the 1970s office space was added at a rate of about 1.5 million gross sq. ft. per year. In the first two years of this decade (1980 and 1981) the average annual office space added was approximately 2.0 million gross sq. ft. An additional 7.8 million gross sq. ft. of office space will be added when buildings under construction (as of August 1982) are completed; another 5.4 million sq. ft. of office space has been approved but is not yet under construction; 4.2 million gross sq. ft. of office space has been proposed and is under formal review by the Department of City Planning. The amount of office space in the downtown area has increased steadily in the past two decades and will likely continue to increase in the next several years."

The first paragraph in the discussion of OFFICE SPACE IN SAN FRANCISCO on p. 51 has been replaced with this new paragraph to reflect the updated information:

"The proposed project would provide about 124,300 gross sq. ft. of new office space. The proposed project, together with other major downtown office buildings under construction and approved as of August 1982, would result in approximately 17.4 million gross sq. ft. of office space (see Appendix C, Table C-8, p. 195). Historically, low vacancy rates together with rising rents suggested that the supply of new office space was less than demand. The increasing availability of downtown office space in the near future may result in a higher office vacancy rate and may lower the recent rapid increase in office rents. These market conditions would be beneficial for future lessees of office space."

VIII. Summary of Comments and Responses

TABLE B-1: MAJOR OFFICE BUILDING CONSTRUCTION IN SAN FRANCISCO THROUGH 1981,
IN GROSS SQUARE FEET

<u>Year</u>	<u>Total Gross Sq. Ft. Completed</u>	<u>5-Year Total</u>	<u>5-Year Annual Average</u>	<u>Cumulative Total of All Office Buildings</u>	<u>Cumulative Total of All Downtown Office Buildings</u>
Pre-1960		(Net) (a)	(Net) (a)	28,145,000(b)	24,175,000(c)
1960	1,183,000				
1961	270,000				
1962	--				
1963	--				
1964	1,413,000				
		2,866,000	573,200		
1960-1964		(2,580,000)	(516,000)	30,725,000	26,754,000
1965	1,463,000				
1966	973,000				
1967	1,453,000				
1968	1,234,000				
1969	3,256,000				
		8,379,000	1,675,800		
1965-1969		(7,541,000)	(1,508,000)	38,266,000	34,295,000
1970	1,853,000				
1971	--				
1972	1,961,000				
1973	2,736,000				
1974	2,065,000				
		8,615,000	1,723,000		
1970-1974		(7,753,000)	(1,550,000)	46,019,000	42,048,000
1975	536,000				
1976	2,429,000				
1977	2,660,000				
1978	--				
1979	2,532,000				
		8,157,000	1,631,400		
1975-1979		(7,341,000)	(1,468,000)	53,360,000	49,389,000
1980	1,284,000				
1981	3,029,000				
		4,313,000(d)	2,156,500(d)		
1980-1981		(3,881,700)(d)	(1,940,850)(d)	57,241,700	53,270,700

TABLE B-1: MAJOR OFFICE BUILDING CONSTRUCTION IN SAN FRANCISCO THROUGH 1982
IN GROSS SQUARE FEET (Continued)

- (a) Net equals 90% of gross. Net new space is added at an increase factor of 90%, since it is assumed that space equal to 10% of a new building is demolished to make land available for the new replacement building.
- (b) Source: San Francisco Downtown Zoning Study, Working Paper No. 1, January 1966, Appendix Table 1, Part 1. For pre-1965, data include the area bounded by Vallejo, Franklin, Central Skyway, Bryant and Embarcadero. Also includes one-third of retail-office mixed use. For post-1964, data include the entire city.
- (c) Gross Floor Space for downtown offices are included for the following functional areas: Financial, Retail, Hotel, Jackson Square, Golden Gateway, Civic Center, South of Market, and Outer Market Street as defined in the cited January 1966 report. For post-1964, the entire area east of Franklin Street is included.
- (d) Two-year total and average.

SOURCE: Department of City Planning, August 1, 1982

Tables C-7 and C-8 (see pp. 125 - 128) have been added to the EIR following Table C-6 on p. 191. Table C-7 lists the projects analyzed as part of the cumulative development, and Table C-8 contains the gross sq. ft. totals for these developments. The list of projects shown in Table C-7 and the development totals shown in Table C-8 include all office projects in the greater downtown area and the south of Market area for which a preliminary draft EIR has been submitted to the City for review or for which plans are well defined and all office projects in redevelopment areas that are under construction or for which Land Disposition Agreements have been approved.

On p. 2 in the EIR, the first sentence of the CUMULATIVE EFFECTS OF DOWNTOWN DEVELOPMENT has been revised to read: "The proposed project, together with other major downtown office buildings under construction or proposed, would add approximately 17.4 million gross sq. ft. to the 57.2 million sq. ft. that now exists in the City."

Mr. Imparato has prepared a list of developments and their square footages; discrepancies between Mr. Imparato's list of developments included in the analysis of cumulative development are detailed in Comments and Responses for Bank of Canton Final EIR, 80.296, certified June 15, 1982. The discrepancies are summarized as follows:

- (1) several hotel and condominium proposals included on Mr. Imparato's list are deleted from the cumulative analyses because these uses generally do not affect peak-hour traffic or transit in the pertinent direction (outbound in the p.m. peak hour);

VIII. Summary of Comments and Responses

- (2) a state office building and a federal office building on Mr. Imparato's list were deleted from the analyses because these projects appear to be speculative;
- (3) projects on Mr. Imparato's list that were not definitive and/or appear to be inactive or withdrawn by the project sponsor were not included in the cumulative analyses;
- (4) several projects on Mr. Imparato's list had square footages higher than the amount reviewed or approved by the Department of City Planning; consequently, the number of square feet for these projects differed in the cumulative analyses.

The revised text sections for the EIR which pertain to cumulative transportation impacts are presented in the Cumulative Transportation section, p. 144 of this response-to-comments document.

The cumulative list of projects and the revised text for the EIR which pertain to cumulative housing impacts are presented in the Cumulative Housing Demand section, p. 129 of this response-to-comments document.

TABLE C-7: CUMULATIVE OFFICE DEVELOPMENT IN DOWNTOWN SAN FRANCISCO AS OF AUGUST 6, 1982

Projects under Formal Review 8/6/82

Assessor's Block	Case No.	Project Name
58	82.234ED	Roundhouse
112	81.258	Ice House Conversion (C)
136	81.245	955 Front at Green
176	81.673	Columbus/Pacific Savoy
228	81.610ED	569 Sacramento (C)
240	81.705ED	580 California/Kearny
265	81.195ED	388 Market at Pine
269	81.132ED	Russ Tower Addition
270	81.175ED	466 Bush
288	81.461ED	333 Bush (Campeau)
288	81.687ED	222 Kearny/Sutter
669	81.667ED	1361 Bush (C)
716	81.581ED	Polk/O'Farrell
3702	81.549ED	1145 Market
3703	81.494ED	1041-49 Market
3707	81.492ED	--[90 New Montgomery]--
3707	81.245C	New Montgomery Place
3708	81.493ED	71 Stevenson at Ecker
3733	82.29E	832 Folsom
3760	81.386	401 6th
3776	81.59	Welsh Commons
3778	81.630ED	548 5th/Brannan
3781	82.99E	Greyhound Bus Terminal
3786	82.33E	655 5th/Townsend
3789	82.31EV	615 2nd/Brannan (C)
9900	81.63	Ferry Building Rehab
9900		Pier One Development
9900		Agriculture Building

Approved Projects 8/6/82

106	81.415ED	1299 Sansome
161	80.191	Mirawa Center
164	81.631D	847 Sansome
164	81.573D	50 Osgood Place
166	CU81.7	222 Pacific (C)
166	80.15	750 Battery
206	81.165D	401 Washington at Battery
227	80.296	Bank of Canton
261	81.249ECQ	333 California
262	81.206D	130 Battery

(continued on next page)

VIII. Summary of Comments and Responses

Approved Projects 8/6/82 (continued)

<u>Assessor's Block</u>	<u>Case No.</u>	<u>Project Name</u>
267	81.241D	160 Sansome
268	81.422D	250 Montgomery at Pine
271	81.517	453 Grant
271		582 Bush
294	82.870	44 Campton Place
311	82.120D	S.F. Federal
351	DR79.24	Mardikian/1170-1172 Market
3512	82.14	Van Ness Plaza
3518	81.483V	291 10th St.
3705	80.315	Pacific III Apparel Mart
3709	81.113ED	Central Plaza
3715	82.16EC	121 Steuart
3717	80.349	Spear/Main (160 Spear)
3717	82.82D	135 Main
3722	81.548DE	466 Clementina (C)
3722	81.417ED	144 Second at Minna
3724	81.102E	Holland Ct. (C)
3729	82.860	774 Tehama
3733	81.2	868 Folsom
3735	80.106	95 Hawthorne (C)
3738	DR80.5	315 Howard
3741	82.203C	201 Spear
3749	81.18	Marathon - 2nd & Folsom
3751	77.220	National Maritime Union
3752	77.220	Office Bldg. (YBC SB-1)
3763	81.287V	490 2nd at Bryant (C)
3763	81.381	480 2nd at Stillman (C)
3775	81.147V	338-340 Brannan (C)
3776	81.693EV	539 Bryant/Zoe
3788	81.296Z	690 2nd/Townsend (C)
3787	81.306	252 Townsend at Lusk
3789	81.552EV	625 2nd/Townsend (C)
3794	81.569EV	123 Townsend
3803	81.244D	China Basin Expansion

Projects under Construction 8/6/82

163	81.1	901 Montgomery
164	81.251D	936 Montgomery-(disco)
167		Golden Gateway III
196		736 Montgomery
196	CU79.49	Pacific Lumber Co.
208	81.104EDC	Washington/Montgomery
237	DR80.6	353 Sacramento (Daon)
239	DR80.1	456 Montgomery
240	DR80.16	550 Kearny
263	CU79.12	101 California

(continued on the next page)

VIII. Summary of Comments and Responses

Projects under Construction 8/6/82 (continued)

<u>Assessor's Block</u>	<u>Case No.</u>	<u>Project Name</u>
287	81.550D	Sloane Building (C)
288	DR80.24	101 Montgomery
289	81.308D	One Sansome
292	DR79.13	Crocker National Bank
312	79.370	50 Grant
351	79.133	U.N. Plaza
762		Opera Plaza
3702	81.25	1155 Market/8th
3708	80.34	25 Jessie/Ecker Square
3709	80.36	Five Fremont Center
3712	79.11	Federal Reserve Bank
3715		141 Steuart
3717	79.236	101 Mission at Spear
3717		150 Spear
3718	79.12	Pacific Gateway
3724		Yerba Buena West
3735		Convention Plaza

* (C) - Conversion (generally industrial and/or warehouse to office)

SOURCE: Department of City Planning.

TABLE C-8: GROSS SQUARE FEET OF CUMULATIVE OFFICE AND RETAIL DEVELOPMENT* IN DOWNTOWN SAN FRANCISCO AS OF AUGUST 6, 1982

<u>Status of Project</u>	<u>Office (Gross Sq. Ft.)</u>		<u>Retail (Gross Sq. Ft.)</u>	
	<u>Total New Constr.</u>	<u>Net New Constr.</u>	<u>Total New Constr.</u>	<u>Net New Constr.</u>
Under Formal Review	4,220,970	3,801,570	310,650	249,150
Approved	5,428,350	4,862,600	187,850	150,310
Under Construction	<u>7,753,050</u>	<u>7,427,350</u>	<u>260,250</u>	<u>136,050</u>
GRAND TOTALS	17,402,370	16,091,520	758,750	535,510

* This category includes all office projects in the greater downtown area and the south of Market area for which a preliminary draft EIR has been submitted to the City for review or for which plans are well defined and all office projects in redevelopment areas that are under construction or for which Land Disposition Agreements have been approved. It does not include projects in Rincon Point - South Beach or Yerba Buena Center Redevelopment Areas for which no Land Disposition Agreements have been approved by the San Francisco Redevelopment Agency Commission as the City will not know precisely what development will be approved in these areas. It does not include Mission Bay as no formal proposal has been submitted to the City.

SOURCE: Department of City Planning.

EMPLOYMENT, HOUSING, AND FISCAL FACTORS

Cumulative Housing Demand, Household Distribution and Developer-Sponsored Housing

COMMENT

Carl Imparato: "On the issues associated with housing, we have a few comments. We begin by reiterating our objection to the use of a 'mere' 9.8 million square feet of projects. That's the level that you use in the cumulative housing analysis on Page [53]. The housing impacts are clearly understated on the table on Page [122], which considers cumulative housing demand for 1979 to 1985, considers that demand associated with just 39,300 additional employees -- 'just' 39,300 additional employees. Those employees translate to less than ten million square feet of office development over the six years 1979 to 1985. That is an average of 1.7 million square feet per year.

"Now it's clear to us that the average for the Seventies may have been 1.7 million square feet per year, but over the last two years, this Commission and the Department of City Planning has been approving more than 3.4 million square feet per year, and at an increasing rate. That includes conversions -- warehouse conversions -- to office space. So, clearly the average of 1.7 million square feet per year over the last six years is an underestimation, even by comparison to earlier EIR's.

"We ask that the table on Page [122] and the entire discussion of housing be revised to be consistent with the much greater impact levels associated with the real levels of cumulative development.

"We question the statement on Page [53] -- this is a quote -- 'An additional 785,000 gross square feet of office space is in the preliminary . . . environmental review process.' 785,000 square feet sounds like almost nothing. It seems far too low. It is totally inconsistent with the data that's in the Montgomery/Washington Final EIR.

"We ask that the housing impact analysis estimate the impacts of cumulative secondary employment-related housing demand on a city-wide basis and on a regional basis. If distribution of secondary employees were the same as that of primary employees, if it were the same, what would be the additional housing demand citywide and regionally? In the table on Page [122], we would ask that you include a column in that table which shows the cumulative demand, primary and secondary, as a percentage of housing growth. Let's compare cumulative demand to housing growth on that table, not just project demand.

"Now, even if the distribution of secondary housing demand can't be quantified as reliably as that of primary demand, you still have to make some reasonable assumptions and try to come up with some estimates, then you qualify those estimates by your assumptions. It is very deceptive to take the secondary demand, which might be about 1.2 times that of the primary demand, so it's a significant impact, and say, 'Well, we don't have an accurate idea of what

VIII. Summary of Comments and Responses

that demand is, so we'll neglect it completely; we'll ignore it as if it's not there.' It's like saying if you close your eyes to the problem, you don't see it, so it goes away. Just make some estimates, make some reasonable assumptions, but don't neglect the demand. Some other EIR's earlier on have tried to take a stab at the estimate, secondary cumulative demand, and this EIR should as well.

"Regarding the statement . . . on Page [53] that the Planning Commission final resolutions have led to agreements to provide 3,300 housing units as of April 1982, we ask for a clarification as to whether they are 3,300 housing credits. Because your later resolutions require meeting a certain number of housing credits, not housing units, under that OHPP nonsense. And one unit can absorb several housing credits under those guidelines."

RESPONSE

The second paragraph and the first sentence of the third paragraph on p. 53 in the EIR have been revised as follows:

"Concerned with the impacts of cumulative office development on the San Francisco housing market, the Planning Commission has recently been requiring office developers to cause housing to be constructed in the City. Downtown office projects that are currently (as of August 6, 1982) under formal review, approved, and under construction and contain 50,000 sq. ft. or more of office space, total about 16.1 million gross sq. ft. of office space (see Appendix C, Table C-8). On the assumption that the housing formulas for new office development reflect the actual demand for housing in San Francisco [see Table B-2, note (a)], office development would result in the demand for about 6,900 to 14,300 households in San Francisco when all projects are fully occupied. This impact on the housing market would be mitigated to a certain extent because office developers have agreed to provide through City Planning Commission final approval resolutions, or have proposed on-site, about 3,800 housing units as of April, 1982. Of these, 1,984 units were explicitly called 'units' in the approval resolution, 250 were called 'credits,' 1,381 were called 'units to be provided in the manner and time provided for by OHPP Guidelines,' and 105 units are presently proposed on site as part of currently unapproved projects. The unmet housing demand resulting from cumulative office development would be for about 3,100 to 10,500 units. This figure would be reduced by projects that have been approved with a commitment to an unspecified number of housing units. (For further explanation, see the note on Table C-8, p. 195.)

"The demand for 3,100 to 10,500 units in San Francisco . . ."

See Summary of Comments and Responses, Table 1, p. 133, for more information about units and credits.

Table B-2, p. 122 of the DEIR, has been replaced with the following table, on p. 185 of the FEIR, to reflect cumulative primary housing demand from office development as a percentage of housing production:

TABLE B-2: PROJECTED EFFECTS OF DOWNTOWN OFFICE DEVELOPMENT ON REGIONAL HOUSING MARKETS, 1982-90

	Net Project Demand in 1985	Gross		Net Housing Stock Growth 1982-1990(d)		Demand as a Percent of Growth, 1982 to 1990	
		Cumulative Demand 1982 to 1990(c)		No. Units	No. Households		
		No. Emp.	No. Households				
San Francisco (a)	55 to 110	9,700 to 25,800	6,900 to 14,300	12,000	0.5 to 0.9	57.5 to 119.2	
Peninsula (b) (San Mateo and Santa Clara Counties)	70	11,600	8,900	87,600	0.1	10.2	
East Bay (b) (Alameda and Contra Costa Counties)	115	19,300	14,900	111,800	0.1	13.3	
North Bay (b) (Marin and Sonoma Counties)	45	7,700	5,900	36,800	0.1	16.0	
TOTAL	285 to 340	48,300 to 64,400	36,600 to 44,000	248,200	0.1	14.7 to 17.7	

(a) Range of San Francisco employees and households based on 101 Montgomery Street Final EIR, EE 80-26, Certified May 7, 1981 (15-30% of all employees would reside in San Francisco and 1.4 workers would occupy each household) and "Office Housing Production Program (OHPP) Interim Guidelines," Department of City Planning, January 22, 1982 (40% of all employees would reside in San Francisco and 1.8 workers would occupy each household).

(b) Distribution of employees based on weighted average of expected employees in Federal Reserve Bank (EE 78.207), 101 California Street (EE 78.27), Pacific Gateway, (EE 78.61), and Crocker National Bank (EE 78.298), from 456 Montgomery Street Final EIR (EE 78.178) p. 167 (18% in the Peninsula, 30% in the East Bay, and 12% in the North Bay). Number of workers per household in these counties is assumed to be 1.3 based on 1980 Census data.

(c) Cumulative demand is based on a list of downtown office projects containing 50,000 gross sq. ft. or more and is available for public review at the Office of Environmental Review, 450 McAllister St., Fifth Floor, San Francisco. Total office space considered in this analysis was about 16.5 million gross sq. ft.

(d) Net housing stock growth based on "Projections 79," Association of Bay Area Governments, January 1980. Projections contained in that document for 1980-1990 were prorated to reflect 1982-1990 net housing stock growth.

The EIR discusses the impacts of direct housing demand because City policy regarding mitigation of housing demand, as defined in "Revised Interim Guidelines for Administering the Housing Requirement Placed on Office Development under OHPP," Memorandum by Dean Macris, December 7, 1981, relates to direct housing demand. City policy does not require mitigation of secondary housing demand. The following discussion of secondary housing demand has been added to p. 55 following the first full paragraph:

"The extent of any additional housing demand resulting from secondary multipliers would be based on a regional economic model. However, a portion of the secondary employment would result from expenditures in San Francisco by employees of the project. It has been estimated that permanent downtown employees who live in San Francisco would each support an additional 0.6 jobs in San Francisco, while each non-resident permanent employee would support 0.13 jobs in the City./6a/

"Under these assumptions, the proposed project would generate about 165 secondary jobs in San Francisco, which, under the City's formula for housing demand, would generate the need for about 35 additional housing units in the City./6a/ This estimate of about 35 housing units assumes that 40 percent of persons filling the secondary jobs would move to the City, as is assumed for office employees, although data to substantiate this assumption are not available. Not all persons filling these jobs would necessarily move to the City."

The following footnote has been added to page 61:

"/6a/ Basis of calculation: San Francisco City Planning Commission, Bank of America Data Center FEIR, certified August 28, 1975, pp. 92-93. The current project would have 515 employees:

205 (40%) San Francisco residents, and 310 non-residents.

$(205 \times 0.6) + (310 \times 0.13) = \text{about 165 secondary jobs in San Francisco.}$

$$\frac{165 \times 40\%}{1.8} = 37 \text{ housing units.}$$

VIII. Summary of Comments and Responses

TABLE 1: Projects with Housing either on site or agreed to by developers to construct off site as per approval resolution and negotiation with DCP.

CPC Resolution #	Project	Number of Housing Units
8877	Five Fremont	construct or rehab 550 units 1/2 low/mod
8942	101 Montgomery	construct and/or rehab 211 units
8991	China Basin	cause construct and/or rehab 150 units
9085	One Sansome	cause construct and/or rehab 512 units
9097	1155 Market	cause construct and/or rehab 115 units
9105	Pacific/Montgomery	cause construct and/or rehab 56 units
9123	101 Mission	cause construct and/or rehab 180 units
9294	Montgomery/Washington	cause construct and/or rehab 210 units
9313	145 Main / 160 Spear	cause construct and/or rehab as defined by OHPP 250 credits
9357	135 Main	231 units per manner and time of OHPP
	388 Market (not approved)	57 units proposed on site
8793	25 Ecker Square	good faith effort to develop or cause to be built or rehabilitated 89 units
	333 Bush (not certified)	48
9396	Marathon - Second and Folsom	618 units per manner and time of OHPP
9418	333 California	532 units per manner and time of OHPP
TOTAL		3,809

SOURCE: Department of City Planning

Rental Housing

COMMENT

Carl Imparato: "On Page [56], next, we question the appropriateness of using census median rental figures for San Francisco. The figures there say that the median rental figure is \$266 per month. . . . I don't believe it. And even if -- this is an embedded rental cost, presumably. You are saying this is what's in the City right now. This is what rentals cost. Now, even if that embedded rental cost were correct, the rental cost impacts that are associated with this project with cumulative growth have to be based on the costs for units that are brought on to the market today. Because that is where the next 50,000 office workers are going to be seeking housing. They're going to look in the Examiner and in the Chronicle. And that's why it is much more reasonable to be looking to a newspaper survey to get an idea of what the rentals are currently in San Francisco or the rental impacts.

"Now, if you want to mitigate the impacts on the City's rental market, you have to look at new rental housing, really. You have to compare the office workers' salaries to the rents for the new rental housing that's being constructed. If you can't come up with that data, then at least use the newspaper surveys, because that shows what rental units are on the market. Actually, with vacancy decontrol provisions, if any presently occupied unit . . . comes on to the rental market . . . it is going to come on at the market level, whatever the market can afford. That would be what you see in the Examiner and Chronicle. It is not the census figures.

"We believe the housing impacts have to be broken down further into the rental impacts and the owner-occupied impacts. It is inappropriate that all the housing mitigation that you try to approve here is directed towards the home ownership market. So we ask, what's the present ratio of rental units to owner-occupied units in the City? How many more rental units will be required because of the project and secondary demand and because of cumulative downtown expansion? How many new rental units will likely be built? And what's the shortfall in rental units? Who would be most impacted if the shortfall is not eliminated? Clearly, the new office workers who are moving into San Francisco are not going to be the impacted group. The impacted group is going to be the people who have less income than the office workers. This new tide of office workers who can afford higher rents are going to displace the people with less income. And those are the people who are impacted. So ultimately, unless you require 100 percent mitigation of both rental and owner-occupied housing impacts for both primary and secondary cumulative demand, which is far from what the OHPP is requiring, unless you get 100 percent mitigation, then all of your mitigation has to really be directed at the lowest income segment of the population. Because those are the people who are going to be displaced by the new people coming in, and this trickle-down theory hits the low-income people, the people who can't compete with the new office workers. So low-mod units, that's really what has to be required for housing mitigation, not market rate condos.

Please discuss the projected availability of rental units in the various price ranges and compare that to the demand generated by cumulative downtown

VIII. Summary of Comments and Responses

expansion, including secondary demand. If possible, please extend the analyses to the Bay Area region."

RESPONSE

Section 15012 (b) of the California Environmental Quality Act (CEQA) states, "Economic information may be included in an EIR or may be presented in whatever form the Agency desires." A complete description of socioeconomic impacts is not required by CEQA. Housing information provided in the DEIR complies with standards accepted by the City and County of San Francisco.

No model is known to the EIR authors that would allow the housing choices of new office workers to be reliably quantified. Using certain assumptions, however, the split in the project-generated housing demand between for-sale and rental housing markets can be estimated.

According to the 1980 census, 34% of all occupied housing units in San Francisco were owner-occupied and 66% were renter-occupied. On the assumption that project-generated households would follow the existing split between owner- and renter-occupied housing, a projection of the distribution of project-generated households can be made. This assumption implies a corollary assumption that project-generated households would have an income distribution and encounter housing costs similar to those of existing residents in the City. Since the ownership/rental housing split in San Francisco was 33% to 67% in 1970 and 34% to 66% in 1980, the assumption that project-generated households would follow the existing ownership/rental housing ratio seems valid.

The following has been added after the fourth sentence of the third paragraph on p. 54 of the EIR: "Assuming that the split between owner- and renter-occupied housing would be the same for project workers as in the 1980 U.S. Census for San Francisco, the distribution of new households generated directly by the project would be 37 owner-occupied (34%) and 73 renter-occupied (66%). The distribution of secondary households would be 13 owner-occupied (34%) and 24 renter-occupied (66%) households."

Current housing market conditions in the Bay Area, and in the nation as a whole, may be characterized by high construction costs and high interest rates that have reduced the quantity of units being constructed from recent historical levels. Rents that must be charged for new rental construction are not competitive with those of existing units; thus, few rental units are being built ("Report of the Citizen's Housing Task Force," San Francisco, July 29, 1981). However, an unknown quantity of purchase housing does find its way into the rental market. According to the Department of City Planning report "Condominium Research Preliminary Progress Report" (December 1981), 41% of the purchasers of condominiums that received tentative and final map approval between January 1979 and December 1981 have claimed a homeowner's tax exemption, indicating "that the majority of condominiums have been sold to investors, buyers of second homes, or homeowners neglecting to file exemption forms." Condominiums are the most common type of new housing construction, but the same proportion of owner occupancy is likely to be true for other types of

purchase housing. A breakdown of new housing construction into rental and purchase categories would not necessarily provide an accurate picture of the actual quantity of rental housing available.

Regarding the issue of displacement, it is not clear from available data that downtown office development is displacing low-income households in the City. It is true that downtown developments are attracting more workers to San Francisco and some of these workers are choosing to live in the City. However, while office space in San Francisco increased by over 14 million gross sq. ft. between 1970 and 1980, the number of San Francisco residents actually declined. Obviously, many factors besides the growth of office space affect the housing market. The current slowdown in new housing construction is a national problem resulting from a wide variety of economic factors, including high construction costs and high mortgage interest rates. The demand for housing in San Francisco may be partly attributable to immigration that is independent of downtown office development, and to the decline in average household size.

A recent study of displacement in San Francisco found no causal inference between office development and displacement of low-income households. Based on a review of available displacement information, the study, "Displacement in San Francisco" (Berkeley Planning Associates, September 2, 1980) concluded, "None of these sources document definitely whether, where or how displacement is taking place." (Underscore from source). The study noted various factors which imply displacement is taking place in certain neighborhoods, including the fact that rents are rising faster than incomes, condominiums and residential hotels are being converted, and levels of reinvestment are increasing in certain neighborhoods. The study concluded that displacement, "...narrowly defined as the forced relocation of a household by circumstances beyond its control, is occurring in San Francisco, ... in a general sense." The study attributed increased demand pressure in the rental housing market as a primary factor influencing displacement.

According to "Clearinghouse Review" (National Clearinghouse for Legal Services, July 1981):

Hypotheses about the causes of displacement include: (a) the general deterioration in the U.S. economy, which leads consumers to place a premium on lower cost housing; (b) escalating costs of new suburban construction as a result of rising land costs, growth controls, environmental regulation, rising materials and labor costs; (c) a new anti-suburban ideology among children of the suburbs; (d) a priority on residences close to work centers because of uncertainties about the availability and price of gasoline; (e) demographic changes: more singles and childless families whose locational preferences are not tied to the location of good (suburban) schools; and (f) increasing appreciation of the architectural qualities of older housing.

Although not mentioned as a possible cause of displacement by "Clearinghouse Review," additional above-median-income employment opportunities may also result in displacement.

VIII. Summary of Comments and Responses

Based on the above review of available information, it seems plausible that many factors are influencing the displacement of low-income households. The housing demand generated by the project may indirectly affect displacement in San Francisco, but this impact would not be measurable; furthermore, it would be an impact that is not conclusively accepted by housing market experts. These possible impacts have been mitigated to a certain extent by City policies including the Residential Hotel Conversion Ordinance (330-81), the Rent Stabilization Ordinance (276-79), and the Condominium Conversion Ordinance (337-79).

U.S. Census data and other sources of information on the costs of purchase and rental housing are included for informational purposes. The DEIR does not imply that census median housing values and median rents would be available to project employees. Census medians indicate that the range of prices would have been above and below these figures, at the time the Census was taken. Complete information concerning the range of rents and housing values is not currently available from the Census.

According to Questor Associates ("Letter Report," May 28, 1982 available for public review at the Office of Environmental Review, 450 McAllister St., 5th Floor) reliable data are not available to establish a mitigation measure (if it were to be required) which would match household incomes of new downtown office workers to the prices and types of housing units that would be affordable to those new workers.

Data needed in order to devise such a housing mitigation measure would include the number, type and price of units that would be affordable to new office workers demanding housing in San Francisco. These data needs are paraphrased in the following questions and technical issues raised in the Questor Associates report.

1. Who are the new employees?

The relationship of office development and employment growth is complex. Much, if not most, of the net increase in employment attributable to new office space will not be located in newly constructed buildings. A substantial portion of the net increase in workers will be workers filling older buildings vacated by those moving into new buildings. It is essentially impossible to trace the chain of employee movements and to know in advance which buildings will be vacated; therefore, it is impossible to know in advance who the new employees will be. To assume that the new employees will reflect the composition of current workers in downtown office buildings (or the composition of 90 New Montgomery employees) would be inaccurate for two reasons:

- a) Each office building is unique and contains a mix of functions and workers which may or may not be similar to that of the "average" building; and
- b) the rapid escalation of downtown office rents could stimulate employers to relocate clerical and support personnel to suburban locations, although the effect and extent of this relocation has not been documented. Thus, assuming data were available on existing

office workers, that data would not accurately reflect the characteristics of new employees generated by the construction of new office buildings.

2. Financial Capabilities of Office Workers

Housing affordability is a function of not only individual worker income, but of total household income. This includes the salaries of all wage earners in the household, plus all non-salary income. The ability of a worker to afford housing also depends on the amount of assets and debt, and for purchasers of housing, down payment amounts and available mortgage interest rates. Therefore, one cannot estimate housing affordability based on individual worker salary alone, as many Bay Area households have two (or more) wage earners and other income variables.

No reliable published data are available on household incomes for office workers in the San Francisco financial district. None are collected or published on a regular basis. Some data are available from surveys of workers in individual office buildings, but these data are not comprehensive. City-wide household income estimates, for all households in San Francisco, are available from several private computer data services, and will soon be available for 1979 through the U.S. Census. No breakdown is available by type or location of employment. Data on wage rates for various office functions are available from the State Employment Development Department or from major office employers. These sources provide income estimates for individuals; they do not provide estimates for household incomes, or for investment and other non-wage income. The 1975 SPUR Study provides wage estimates for several categories of downtown office workers. SPUR data do not indicate household income, and may not reflect wages of then existing or future downtown office workers.

While comprehensive and detailed surveys of existing office workers could provide substantial information, there are several questions concerning the reliability of the information obtained, the ability to estimate affordability from that information, and the transferability of the new results to new workers associated with the construction of a new building. For example, while household income can be obtained through interview surveys, it is typically the most difficult and least reliable data gathered in survey research because of its confidential nature. Many people are not willing to tell an interviewer how much they and other family members earn, how much savings and unearned income their households have, and how much money they owe.

3. Housing Needs and Preferences

In addition to financial considerations, housing requirements (needs) and location preferences affect housing affordability. The location preference - how many new workers would want to live in San Francisco - is a matter of individual choice. No previously-collected data exist on the housing location preferences of new workers. For the EIR, this question has been addressed by the housing demand formula of the Department of City Planning, which assumes that 40 percent of all new office workers would want to live in San Francisco based on past residency patterns (Department of City Planning, "Office Housing Production Program Interim Guidelines,"

VIII. Summary of Comments and Responses

January 1982). However, the question of housing needs, such as the number of bedrooms, is only partially addressed in this formula and would have to be estimated through a survey. Such a survey would be subject to the same limitations described above in item No. 2.

4. Relationship to Housing Supply

The availability and affordability of housing in San Francisco is only partially a function of demand created by office development. As interest rates remain high, affordability is constrained throughout the Bay Area. However, the problem is compounded in San Francisco because of higher land costs, higher building costs and difficulties in obtaining approvals for infill housing in the City, and greater demand for housing by single-person households in relation to other Bay Area cities. Another factor is housing demand in San Francisco caused by Bay Area employment growth in other job sectors such as the electronics industries. Finally, because of the relative distribution of vacant land in the Bay Area, substantially fewer units have been, and can be, produced in San Francisco than in outlying suburban counties. Therefore, constructing housing to satisfy demand relating to new employment will remain less feasible in San Francisco than in other parts of the Bay Area housing market.

In summary, without specific data, primarily concerning the identification of new workers and the household income and assets of each new worker, there is no method of reliably predicting the distribution and affordability of units that would match the household incomes of new employees.

Transit Costs and Funding

COMMENTS

David Jones: "[The EIR] says within 2,000 feet of this building, the cumulative impacts of the project will cause a 43 percent increase in Muni patronage. It mentions the five-year plan as only planning on a 25 percent increase. But it mentions also that that five-year plan is contingent upon federal funding, which does not exist; contingent upon articulated vehicles, none of which have been ordered; and contingent upon an Embarcadero Loop to get away from the turnaround at The Embarcadero we have now, which has not been designed, [and] has no funds. . . .

"We are talking about a 43 percent increase in Muni. . . with no assurance that it can be accommodated in any way.

"Based on today's information, based on the 1983 federal budget and the 1982 federal budget -- is this money going to come? Are we going to get new buses? Are we going to get articulated vehicles? Is there going to be a turnaround? And, if not, the EIR should state that we're in real trouble. It states we're in trouble enough because there's a 43 percent increase and there's only a 25 percent increase in capacity planned in the Muni five-year plan. What's the real increase in Muni available -- based on the real funding situation and the real chances of getting things from Muni?

"BART. A 36 percent increase. Only 25 percent of that increase is planned. And it doesn't say whether it's contingent on Federal funds or not. I would like to know whether that 25 percent increase is there. The EIR says, well, if there is an increase, maybe it could be accommodated by AC Transit. Well, let's look at AC Transit. It states they're presently at 7,800 passengers, 100 percent of seated capacity during peak p.m. commutes, and the cumulative development will be 5,000 more trips, which is a 64 percent increase. The EIR says that AC has no plans to buy any new buses. The EIR doesn't also mention that AC just laid off a lot of drivers because they can't afford to run the buses they have.

"So we've got a 64 percent increase in AC Transit. With this statement, there's no new buses, there's no drivers to take the buses there. It doesn't tell you how you get out of this box of where these people are going to be except that in BART they said, 'Well, maybe AC Transit can take the extra people.' It's just people . . . pointing a finger all around a circle.

"SamTrans now has 1,200 passengers, 100 percent seated capacity. This EIR says they'll have 800 or more, up 67 percent. It says SamTrans told us we'll make a good faith effort to give it a high priority. I don't know whether there will be any more SamTrans buses. I've been worried about the transportation.

"CalTrans. They say they have no plans for expanding the Southern Pacific service right now.

"This is about the fifth EIR I've seen where incredible analysis of Muni finances is based on a phone interview with Bruce Bernhardt. . . . It is not an incremental analysis of the new costs. It is not based on the fact that you have to buy a bus; it assumes federal funding. You are talking about here for this building, 150 Muni riders at the peak hour; that would be two additional buses. Well, I would like to see an analysis if the City had to buy those buses and the City had to have somebody drive the bus in the morning and the bus in the evening to take care of that incremental peak, because that bus won't be needed all day.

"What are the costs? I have a feeling they would be pretty high, because if it costs \$90,000 a bus, the present worth, assuming 15 percent interest, \$35,000 a year cost for the purchase of the bus. It costs about \$50,000 a year to operate and maintain a bus. Talking about \$90,000 a year for a bus. They use a number of 29 cent deficit or something, multiplied by the number of rides, multiplied by all these factors, based on a phone call with Bruce Bernhardt. I'd like to see this analysis figure out what new incremental amount of buses they'll need and how much it would cost. And I would like to see it supported with some data. . . .

"I would also like to see the Guidelines for Environmental Evaluation Transportation Impacts, October 1980, which the Department of City Planning has, reanalyzed to see how relevant these cost figures are."

Commissioner Kelleher: "I have a comment on Page 65. I get the impression that the 25 percent increase is going to be easily handled by the Muni. I would like to see some costs related to these projects to provide this

VIII. Summary of Comments and Responses

25 percent increase to Muni. I would like some more discussion on how this is to be funded and how solid the funding would be with Muni.

"I'd also like to see those costs that are not funded by the federal government related to overall fare increases that would be required to fund it through fare collections."

RESPONSE

Effective April 1, 1982, the Muni fare per ride was increased from \$0.50 to \$0.60. That increase was triggered primarily to meet the fare box revenue requirements of Assembly Bill (AB) 1107. AB 1107 allows Muni to receive a portion of the one-half cent BART sales tax revenue for operating expenses provided that at least one-third of Muni's annual operating cost is paid from fare box revenues. As Muni's annual operating costs continue to increase, the \$0.10 fare increase was needed to meet the one-third operating revenue requirement of AB 1107. The one-half cent BART sales tax is an important, stable revenue source for Muni because revenues generated from the sales tax tend to rise in proportion to inflation.

Revenue that would be generated from implementation of the Transit Impact Development fee, now in litigation, or a similar funding mechanism, is anticipated to meet the widening gap between Muni costs and General Fund revenues disbursed to Muni. Total annual General Fund revenues collected have not kept pace with inflation.

The data contained in "Transit Assessment District Cost Study" (City and County of San Francisco, Office of the City Attorney, October 1, 1981) were generated to calculate the net deficit of Muni on a per-square-mile basis. The study also contains operating costs per passenger mile and revenue per passenger trip. The total number of downtown passenger trips, however, was not determined for the purposes of the study. According to Bruce Bernhard, Muni Chief Accountant (telephone conversation, December 30, 1981), net deficit per passenger trip cannot be calculated using the data given in the "Cost Study."

The DEIR contains no mitigation measure concerning special project payments for Muni, Golden Gate Transit, and AC Transit. Reference is made on pp. 54-60 of the EIR to the current status of the payment to Muni of a one-time fee of up to \$5.00 per gross sq. ft. upon construction of new office space in the Downtown area. A measure with that aim was adopted in April 1981 by the Board of Supervisors (Ordinance No. 224-81) and is currently in litigation. If it is sustained, the sponsor would contribute funds for maintaining and augmenting transportation service as provided for by City Ordinance. This would include Muni's transit services.

On February 1, 1982 the Board of Supervisors approved by resolution a measure declaring its intent to form a Core Area Transit Maintenance District, determining that a portion of public transit is provided Downtown in lieu of public parking places, and to impose upon real property within the area an annual payment for transit maintenance based on gross floor area. The project site is within the proposed district and would be subject to the legal assessment provisions finally adopted.

VIII. Summary of Comments and Responses

On July 12, 1982, the Board of Supervisors voted to defer a decision on the measure until January, 1983 pending a decision by the State Supreme Court on the legality of other measures increasing revenues that could be used by Muni. On August 5, 1982, the State Supreme Court ruled that the increase in business taxes was legal, therefore the revenue collected (amounting to \$55 million that was held in escrow) would be available to the General Fund. While increased business tax revenues would accrue to the General Fund, these revenues would not necessarily be allocated to Muni (whereas revenues from the Muni assessment district would). Each year, the Board of Supervisors determines the share of General Fund revenues which Muni receives. Also, total revenues could change if property tax distribution to the City and County changes in future, payroll taxes fluctuate due to employee salaries, and office and retail rents fluctuate, thereby affecting gross receipts tax.

The EIR quantifies the projected tax revenue generated by the project to Muni in 1984 (\$43,300) on p. 59. Project-generated revenues to BART would total about \$17,300 from property and sales taxes (p. 60).

AC Transit, Golden Gate Transit, SamTrans, and Caltrans Peninsula Train (Southern Pacific) do not receive direct subsidies from taxes collected in San Francisco. All receive federal and state subsidies. Bay Area residents contribute to these transportation systems through federal taxes, bridge tolls, and state gasoline and sales taxes paid in the counties where purchases are made. Future modifications in the federal and state allocations and in fare structures cannot be forecast.

The average deficit per ride on Muni is \$0.39 per trip (p. 59). Costs of the project to Muni would be about \$27,260 annually. (515 employees x 29% Muni riders x 468 rides per year x \$0.39 net cost per passenger trip = \$27,260.) The average net cost for AC Transit not covered by fares is about \$0.72 cents per passenger trip (Don Larson, Manager of Planning and Research, AC Transit, telephone conversation, July 13, 1982). Cost of the project to AC Transit would be about \$13,885 annually (515 employees x 8% AC riders x 468 rides per year x \$0.72 net cost per passenger trip = \$13,885). The average net cost per Golden Gate Transit passenger trip is \$1.14 (Peter Dyson, Senior Planner, Golden Gate Transit, telephone conversation, March 15, 1982). Based on this figure, the net cost of the project to Golden Gate Transit would be \$13,740 (515 employees x 5% Golden Gate Transit riders x 468 rides per year x \$1.14 net cost per passenger trip = \$13,740). The average net cost per SamTrans passenger trip is \$0.81 (Gregory Kipp, Program Analyst, SamTrans, telephone conversation, July 13, 1982). Cost of the project to SamTrans would be \$3,904 (515 employees x 2% SamTrans riders x 468 rides per year x \$0.81 net cost per passenger trip = \$3,904). The exact proportion of these deficits that would be paid to respective transit agencies by workers of the proposed project, or downtown office workers in general, cannot be estimated because the amount of tax revenues that each employee would contribute to funding sources cannot be determined. The distribution of riders on regional transit agencies is from Attachment 1 of the Guidelines for Environmental Evaluation Impact Review, Transportation Impacts, San Francisco Department of City Planning, October 1980.

VIII. Summary of Comments and Responses

Transit agencies receive funding for capital improvements from several sources including Transit Development Act State gasoline tax funds, Federal UMTA grants, and State Transportation Assistance Programs, all of which are disbursed through the Metropolitan Transportation Commission (MTC). Jay Miyazaki, Manager of Allocations and Assistance at the Metropolitan Transportation Commission, anticipates that these funding sources and additional sources, such as toll bridge revenue and UMTA special programs, will continue to be available in the future (telephone conversation, July 8, 1982). Should funding sources for capital improvements no longer be available or should the amount of funding decrease, sufficient capacity may not be added to these systems in the future. Should this occur, excess travel on these systems can be expected to either shift to another non-peak ridership mode of travel or to other less crowded times if working conditions permit and off-peak transit capacity is available.

TRANSPORTATION

Cumulative Impacts

COMMENT

Carl Imparato: "In analyzing the cumulative impacts on transit, . . . a more realistic, much higher level of downtown development should be used."

RESPONSE

The last paragraph on p. 64 of the EIR has been revised to read:

"A total of 17.4 million gross square feet of office space is proposed, approved or under construction in the City. Tables C-7 and C-8, in Appendix C, show the projects included in the cumulative analysis. Approximately 1.3 million gross square feet of existing office space would be replaced by the proposed development, resulting in about 16.1 million gross square feet of net new office space. This growth would generate approximately 48,000 person trip ends during the week day p.m. peak hour. (This includes the 23,100 person trip ends from the buildings within 2,000 ft. of the project.) Based upon existing transportation patterns about 15,200 person trip ends would occur by automobile, about 12,000 would occur on Muni, and the remainder would occur on other transit agencies and on other modes (bicycle, walking, etc.). Assuming existing average automobile occupancy rates cumulative development would generate approximately 10,500 new peak hour vehicle trip ends. Because the present population of persons traveling by each mode can be expected to change in the future most of this City-wide peak hour increase might be expected to be accommodated by a shift from single-occupant automobile to public transit or ridesharing."

The second paragraph on p. 64 of the EIR has been updated to reflect changes in the amount of cumulative development proposed in the City since the time of the publication of the Draft EIR. The cumulative totals originally analyzed are about 1.7 million square feet larger than the new totals; thus, the analysis in the impact section would be "worst case." Table C-6, p. 191 (p. 145 in this summary) has been revised to reflect these changes. The second paragraph on p. 64 has been revised as follows:

"Within a 2,000-ft. walking distance of the site are about 13 proposed office projects, ten approved office projects, and eight office projects under construction. In addition, several residential and hotel projects are proposed in the project vicinity. The Meridian Hotel is under construction one block west of the project site. The new office buildings would generate about 23,100 new p.m. peak-hour person trip ends, increasing patronage on Muni lines serving the area by about 5,900 riders. Peak-hour pedestrian trips in the area would be expected to increase roughly 30% (see Table C-6 of Appendix C, p. 191, for a list of developments in the area). These projections are included in the discussion of cumulative impact on Muni and in the conditions for pedestrians given below."

TABLE C-6: ANTICIPATED OFFICE DEVELOPMENT WITHIN A 2,000-FOOT RADIUS OF THE SITE *

Projects under Formal Review 8/6/82

Assessor's Block	Case No.	Project Name
265	81.195ED	388 Market at Pine
269	81.132ED	Russ Tower Addition
270	81.175ED	466 Bush
271		582 Bush
271	81.517	453 Grant
287	81.550D	Sloane Building (C) **
288	81.461ED	333 Bush (Campeau)
288	81.687ED	222 Kearny/Sutter
3705	80.315	Pacific III Apparel Mart
3707	81.492ED	90 New Montgomery
3707	81.245C	New Montgomery Pl.
3708	81.493ED	71 Stevenson at Ecker
3709	81.113ED	Central Plaza

Approved Projects 8/6/82

261	81.249ECQ	333 California
262	81.206D	130 Battery
268	81.422D	250 Montgomery at Pine
311	82.120D	S.F. Federal
3722	81.417ED	144 Second at Minna
3724	81.102E	Holland Ct. (C)
3733	81.2	868 Folsom
3735	80.106	95 Hawthorne (C)
3738	DR80.5	315 Howard
3749	81.18	Marathon - 2nd & Folsom

Projects Under Construction 8/6/82

263	CU79.12	101 California
288	DR80.24	101 Montgomery
289	81.308D	One Sansome
292	DR79.13	Crocker National Bank
312	79.370	50 Grant
3708	80.34	25 Jessie/Ecker Square
3724		Yerba Buena West
3735		Convention Plaza

	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
	Total New	Net New	Total New	Net New
	Constr.	Constr.	Constr.	Constr.
GRAND TOTALS	8,916,150	7,961,500	303,050	152,410

* See Figure 19, p. 67 for area within 2,000 ft. radius of the site.

** (C) - Conversion (generally industrial and/or warehouse to office)

SOURCE: Department of City Planning

VIII. Summary of Comments and Responses

Muni

COMMENT

Commissioner Bierman: "P. 65 Muni. Third paragraph, last sentence, 'are not expected to improve' is probably misleading. More likely 'expected to be more severe' would be more accurate. Also, the page should include some of the language in the appendix on page 124.

"Example: 11 lines will have more than 150% of seated capacity.

"In aisles, physical contact and conflicts are unavoidable. Crowding . . . etc.

"On 15 lines, 80-100% of 150% of seated capacity. [There would] seldom be a vacant seat. Standees uncomfortably close together.

"On 6 lines, patrons can avoid physical contact and conflicts.

"Otherwise the Muni section doesn't tell how bad it will be."

RESPONSE

A sentence has been added to the third paragraph on p. 65 to read, "If demand increases more rapidly than capacity, the crowded conditions on some vehicles would be more severe."

A paragraph has been added after the third paragraph on p. 65 to read, "Present worst-case p.m. peak-hour conditions on outbound Muni vehicles within 2000 ft. of the project site consist of 11 lines having more than 150% of seated capacity, causing physical contact and conflicts in the aisle. Fifteen lines operate at 120-150% of seated capacity, where there is seldom a vacant seat and standees are uncomfortably close together. Six lines would operate at less than 120% of seated capacity where riders can avoid physical contact and conflicts. (See Table C-2, p. 187.)"

Parking

COMMENTS

David Jones: "[The EIR] doesn't show the cumulative impact for parking. The One Sansome EIR states that there will be an 8,600 space shortfall as a result of cumulative impacts. So now we have the transit analysis saying people will drive, and the parking analysis says there's going to be a 8,600 parking space deficit, and maybe the people will have to take transit.

"Again, this EIR shows incredible problems. It doesn't say how we are going to deal with them. I would like this EIR to have a cumulative impact analysis on parking to see what's going to happen there."

VIII. Summary of Comments and Responses

Commission Vice President Nakashima: "On Page 70 you're eliminating 100 parking spaces and not replacing any of them. This is where I differ with staff, in that I think there should be some attempt to replace some of that public parking."

RESPONSE

The following material has been inserted on p. 71 of the EIR after the second full paragraph (before SERVICE VEHICLES):

"The project would have an average seven space deficit for short-term parking. Within the near vicinity (about 1,000 ft.) of the project site approximately 2,650 off-street commercial parking spaces are available. About 270 of these spaces are located on a site of proposed future construction and about 800 of these spaces are located on parcels in the Yerba Buena Center Redevelopment Area that could eventually be sites of future construction. Average daytime occupancy in the unaffected spaces is approximately 91% with about 150 spaces open at any one time. Cumulative short-term parking demand from proposed and under construction buildings near the project is estimated to be 100 spaces. The short-term parking supply in the area within 1,000 ft. of the project would exceed the cumulative demand by about 40 spaces assuming the removal of off-street parking by proposed buildings.

"Long term parking demand for the cumulative development in the greater downtown area has been estimated to be 15,600 spaces (including the project). The project would represent 0.8% of the total demand. Long term parking demand has been assumed to be distributed over the greater downtown and south of Market areas rather than being concentrated near the proposed project locations. Long term parking demand is typically work (employee) related and is more likely to be influenced by cost rather than by location. A recent survey by the Department of City Planning shows that there are about 37,000 off-street parking spaces in the C-3 zoning area and an additional 6,500 spaces in the area bounded by The Embarcadero, Folsom, Eighth and Bryant Sts./14/ Based upon average occupancy, about 4,100 spaces are available on a daily basis. The cumulative demand for the whole downtown area would create a net deficit of 11,500 spaces.

"The deficit would most likely be less as the survey did not inventory parking in the Civic Center area, the areas west of Eighth St., south of Bryant St. or north of Washington St. The survey did indicate that inside the study area about 6,000 parking spaces have been added since 1967 and approximately 1,400 are proposed to be added (exclusive of any parking to be provided in Yerba Buena Center).

"The Master Plan Parking Policy has stated the need to "encourage short-term use of existing parking facilities within and adjacent to the downtown core by converting all day commuter parking to short-term parking in areas of high demand or to car/van pool parking where short-term parking demands are low."/15/ Accordingly, approximately 14,000 existing off-street spaces in the C-3-O planning district could be converted to short-term only parking if the City enacted legislation to establish public control over private garages.

VIII. Summary of Comments and Responses

"Imbalances in long-term parking demand and potentially supply, given projected cumulative development and demand, would be expected to encourage the use of car pools and van pools, or the creation of satellite (intercept) parking facilities in outlying non-residential areas, with shuttle or expanded Muni service to the downtown area, or increased use of transit directly for commuters from San Francisco or from suburban centers (East Bay, North Bay, Peninsula). Peninsula residents, for example, could find Southern Pacific commuter trains more attractive if they could not get any closer to downtown by car than the train terminal at Fourth and Townsend Sts. All transit options would add to the burdens of the regional and local transit system, particularly Muni."

The following notes have been added on p. 75a of the EIR.

"14/ Inventory of Off-Street Parking Spaces, San Francisco Department of City Planning, May 24, 1982.

"15/ Revisions to the Transportation Element of the Master Plan Regarding Parking, Resolution 7647, San Francisco Planning Commission, January 20, 1977."

OPERATIONAL AIR QUALITY

COMMENT

Commissioner Bierman: "P. 25. Again, using air quality testing two miles from the site gives us inadequate data on the real pollution problem, particularly at rush hours. It gives no real clue as to the effect on people's lungs in the compact core where development is taking place. Why don't we force accurate reading of downtown? Using [BAAQMD] rules [is] not good enough for San Francisco in my view."

RESPONSE

The air quality analysis presented on pp. 25-26 and 75-77 of the EIR is based on estimates of the worst-case air quality conditions that could reasonably be expected to occur. The background carbon monoxide concentration assumed for this estimate is a three-year average of the second-highest value recorded at the 900 23rd St. BAAQMD monitoring station. Data from this station is assumed to be representative of background concentrations in the downtown area (Sally Freedman, Planner, Bay Area Air Quality Management District, telephone conversation, May 18, 1982). Use of the three-year average avoids short-term weather-induced fluctuations, and the use of second-highest values produces an assumed background concentration much higher than average background values. The meteorological conditions assumed for the worst-case analysis, a combination of low wind speed, neutral atmospheric stability (poor dispersion), and overcast conditions are the worst conditions that could occur for carbon monoxide. The assumed vehicle volume is the peak value determined on p. 63 of the EIR. The resulting worst-case situation has a very low probability of occurring.

VIII. Summary of Comments and Responses

Furthermore, air pollutant measurements at the site would need to be taken for three years to provide background values reasonably free of short-term, weather-induced fluctuations. Measurements taken over shorter periods might be correlated with BAAQMD data to increase their validity. Values are not expected to differ substantially from BAAQMD data.

Monitoring of street-level carbon monoxide concentrations at Washington and Battery Sts., a known carbon monoxide "hotspot", in 1979 and 1980, and at 100 Harrison St. in 1980 and 1981, indicated that background concentrations in downtown "hotspots" do not differ substantially from measurements made at 900 23rd St. ("Summary of 1979/80 CO Hotspot Monitoring Program," BAAQMD, June 1980 and "Summary of 1980/81 CO Hotspot Monitoring Program," BAAQMD, 1982).

On p. 77, Table 5 has been replaced with this revised table to reflect the cumulative traffic impacts:

TABLE 5: PROJECTED LOCAL CURBSIDE CARBON MONOXIDE IMPACTS*

<u>Street</u>	<u>Averaging Time</u>	<u>Existing</u>	<u>1985**</u>	<u>1985** + Project</u>
Mission (west of New Montgomery)	1-hour 8-hour	16.8 ppm <u>9.1</u> ***	15.1 ppm 7.9	15.2 ppm 7.9
New Montgomery (north of Mission)	1-hour 8-hour	14.1 8.2	12.1 7.0	12.2 7.0

* Calculations were made for worst-case dispersion meteorology according to BAAAPCD (now BAAQMD), 1975 Guidelines for Air Quality Impact Analysis of Projects, updated for EPA, EMFAC-6C motor vehicle emission rates, 1981.

** Projected 1985 traffic volumes include non-analyzed growth (1% per year), cumulative development and the project. Air quality improvements result from continuing introduction of autos with improved pollution control devices, and phasing out of older, more-polluting vehicles.

*** Underlined values are those exceeding the applicable standard (35 ppm for one hour, 9 ppm for eight hours).

SOURCE: Environmental Science Associates, Inc.

ENERGY/1

COMMENT

Flint A. Nelson: "The most disturbing aspect of the energy component for this EIR is the energy budget information. First, on page [85] the EIR notes that: 'Several aspects of the project's energy system are not yet resolved, so a comparison of the project's energy budget with the building performance standards set by Title 24 . . . would be premature.' Nearly every other . . . Draft EIR I have reviewed has been considerably more definitive than this, and I see no reason why this sponsor must remain so vague. . . . the sponsor has refused to use any modeling to determine energy consumption, which makes all of the energy performance data and related statements somewhat dubious in quality. . . . [The project sponsor should] perform modeling to provide accurate and verifiable energy consumption projections."

RESPONSE

Mr. Nelson's comments of May 19, 1982, were written in response to the Preliminary Draft EIR rather than in response to the Draft EIR (May 21, 1982) which reflected more detailed and recent information.

The project would comply with Title 24 under the prescriptive method, rather than by the performance (energy budget) method. However, the project's energy budget is reported in the EIR in compliance with City environmental review requirements. Without using a computer, Glumac and Associates, the project engineers, modeled the building's energy budget using the same methodology as the computer program. The decision not to employ a computer model at this time to aid in the computation of the energy budget does not invalidate their results. Computer modeling is not required either by the City or the State of California.

COMMENT

Flint A. Nelson: ". . . I am troubled by the fact that the sponsor's current energy budget estimate is 90% higher than the Title 24 requirement. Most buildings at this stage are proposing to beat the Title 24 standard by 10-20%, and this sponsor cannot even state precisely how compliance would occur. [The project sponsor should] prepare a specific plan to get the projected energy budget down from 221,000 Btu/square foot to 100,000 Btu/square foot."

RESPONSE

The project sponsor has indicated that the building would comply with Title 24 requirements under the prescriptive method (see above response). Additionally, some design characteristics have now been resolved, allowing a more precise projection of the building's energy budget. A central, full economizer air distribution system selected by the sponsor would be combined with a variable air volume reheat system serving the tenant floors. Based upon this additional design information, the project's estimated annual energy budget, adjusted by Title 24 assumptions, would be about 123,000 Btu per sq. ft.

VIII. Summary of Comments and Responses

COMMENT

Flint A. Nelson: "[The project sponsor should] agree to perform an energy audit after 18 months of full occupancy and install any measures with paybacks of 10 years or less."

RESPONSE

On p. 96, the following mitigation measure has been added under MEASURES PROPOSED AS PART OF THE PROJECT:

- "- One year after full occupancy of the structure, actual energy consumption data from Pacific Gas and Electric Company (PG&E) monthly billings shall be reported to the Department of City Planning. If building energy consumption exceeds applicable state standards in effect at the time of issuance of the Building Permit, an energy audit shall be performed by PG&E or another qualified auditor, and an energy management program, including consideration of possible retrofit measures, shall be developed and implemented to reduce energy consumption."

COMMENT

Flint A. Nelson: "[The project sponsor should] agree to install variable air volume systems on each floor . . . and agree to provide at least one meter for each floor, if not for each tenant."

RESPONSE

See above response on variable air volume system. The intent of metering each floor is to increase accountability for energy consumption; the assumption is that when tenants are billed for their own energy consumption, rather than being billed for a share of the total building energy consumption, they will conserve energy. According to Glumac and Associates, project engineers, the building has been designed for a large number of small tenants. Metering each floor separately would not achieve the purpose of monitoring each tenant's energy use separately if there were more than one tenant per floor, so they would have no incentive to conserve. Separate metering for each tenant would increase construction costs and reduce floor layout flexibility. The sponsor is designing for meters only at the main service to the building.

COMMENT

Flint A. Nelson: "[The project sponsor should] agree to install photo-cell controls for perimeter lighting where daylighting is available."

RESPONSE

On p. 96a, the following mitigation measure has been added under MEASURES NOT INCLUDED AS PART OF THE PROJECT:

VIII. Summary of Comments and Responses

"- The project sponsor is evaluating the installation of photoelectric controls in areas where daylight would have a significant impact on interior light levels. A photocell, connected to the double level switching required by Title 24, would reduce artificial light levels to half when daylight supplemented the light levels sufficiently. Photocells would be installed if they are determined to be economically feasible."

COMMENT

Flint A. Nelson: "[The project sponsor should] agree to achieve a maximum overall lighting level of less than 2.0 watts/square foot."

RESPONSE

A figure of 2.0 watts per sq. ft. for lighting loads was used in calculating the project's energy budget. The project sponsor has done this in other buildings, and has been able to keep total lighting loads below this level. The project sponsor would keep a cumulative total of all lighting within this building and would insure that the overall average does not exceed 2.0 watts per sq. ft. of the total building area.

On p. 96, the following mitigation measure has been added under MEASURES PROPOSED AS PART OF THE PROJECT:

- "The project sponsor would insure that average installed lighting levels do not exceed 2.0 watts per sq. ft."

COMMENT

Flint A. Nelson: "[The project sponsor should] provide more specific information on the [first two] measures listed on page 76." [pp. 95-96 in the DEIR]

RESPONSE

The following design changes have been made in the project since publication of the Preliminary DEIR and are listed in the mitigation measures proposed as part of the project on pp. 95-96 in the EIR:

All rooms would have individual, double-level switching and use energy-conserving light sources. Photoelectric controls are also being considered.

The building air conditioning system would be operated in the most energy-efficient manner possible within code and comfort limitations. A central, full economizer air distribution system selected by the sponsor would be combined with a variable air volume reheat system serving the tenant floors. Exact operating criteria would be determined at a later date.

According to the project architect, because of PG&E regulations, the service to the building would be 120/208V, so that no internal transformers would be required.

VIII. Summary of Comments and Responses

COMMENT

Flint A. Nelson: "Explain why . . . on page [82] the sponsor believes the building's projected energy budget (221,000 Btu/square foot) is comparable to other buildings in the area --- since most similar buildings are [proposing to] achieve 100,000 Btu/square foot or less."

"In general, this project's energy analysis and proposed mitigation measures are vague and unresponsive to the City's growing energy sensitivities. . . . In summary, I believe this sponsor has a long way to go if we are to be satisfied that the building will be energy efficient."

RESPONSE

The building's energy budget was projected on the basis of actual building operating schedules, rather than on the basis of Title 24-assumed schedules. The Title 24 assumptions provide a common basis for comparisons of buildings with widely divergent operating schedules. When adjusted to these assumptions, the building's energy budget, (123,000 Btu/sq. ft./year) is about 40% less than an average budget (210,000 Btu/sq. ft./year) based on other similar, recently proposed office high-rises for downtown San Francisco (see Appendix E, p. 198 in the EIR). The EIR states that the project's budget is similar to the average energy budget.

/1/ The information for these responses is based on a letter of June 24, 1982, from Peter Balint, Glumac and Associates, Inc., Consulting Engineers to Peter Gordon, Project Manager, Gensler and Associates, Architects. This letter is on file at the Office of Environmental Review, 450 McAllister St., 5th floor. Additional information was provided at a meeting between Environmental Science Associates, Inc., Glumac and Associates, and Gensler and Associates on August 16, 1982. Energy budget calculations prepared by Glumac and Associates are also on file at the Office of Environmental Review.

DOWNTOWN EIR

COMMENT

David Jones: "I do not think any projects can proceed during the downtown EIR process, because building any building is proceeding with one of the six project alternatives before the project -- that is, the downtown EIR -- has been evaluated. . . . This EIR doesn't even reference that there is a downtown EIR or that this is a project EIR or that this is a master EIR or what's going on."

RESPONSE

The Downtown EIR, currently in preparation, will assess a series of alternative planning possibilities for the Downtown area. The Downtown EIR, when completed, is expected to present an environmental analysis of a series of future policy options for the overall development of the Downtown. The EIR on the specific 90 New Montgomery project does not, and

VIII. Summary of Comments and Responses

need not, evaluate all of the overall downtown planning possibilities. On July 22, the Superior Court of San Francisco determined that "nothing in the California Environmental Quality Act, the State Guidelines, the Government Code, the San Francisco City Charter, the San Francisco Administrative Code, or the case law supports [the] position that the pendency of a program EIR such as the Downtown EIR herein disables [the Commissioners] from acting upon and/or approving and certifying project EIRs pending completion of the program EIR or from approving such projects."

The alternatives chapter of this EIR discusses project alternatives which relate to existing City policies. The on-going alternative-scenario analysis in the Downtown EIR will cover several possible futures and encompass numerous policies which have not yet been approved by the City. It is inappropriate to draw comparisons between existing policies and speculative future policies which may be altered or amended several times before they are proposed for approval.

MITIGATION MEASURES

General

COMMENT

Carl Imparato: "The last area we want to comment on is mitigation. This EIR should list all the proposed mitigation measures which would fully mitigate all of the impacts of the project. It should not just list the mitigation measures which the developer thinks are reasonable. All mitigation measures which would protect the people of San Francisco and the region from the project's impacts should be listed so that you as a Commission know what you can do. The developer can choose to reject those measures, and that's fine. That's his choice. But the measures should be in the EIR. You can choose, as a Commission, to not require the mitigation measures. That's fine. It's your prerogative. But the public really needs to know what is needed to mitigate the impacts, what could be done."

RESPONSE

Mitigation measures described on pp. 92-98 of the EIR are in compliance with CEQA guidelines. These mitigation measures include not only those that have been accepted by the project sponsor, but also additional mitigation measures that are not included as part of the project. The City Planning Commission can require that these measures be included in the project as a condition of project approval. Significant environmental effects that cannot be avoided if the project is implemented, even if all mitigation measures are adopted, are described on p. 99 of the EIR in accordance with CEQA guidelines.

Housing

COMMENTS

Carl Imperato: "On Page 92, . . . there is a discussion of 377 housing credits that have been awarded from a previous agreement, and they'll apply 112 of those housing credits for this building. . . . What [is] the cost of those credits?"

"We ask that you please incorporate mitigation measures for housing; complete, 100 percent mitigation by constructing [112] units, plus units for secondary projects' generated demand. Those units should be apportioned to rental, owner-occupied markets, low-, mod-, and market-rate markets according to the project's generated impacts on those markets."

David Jones: "112 dwelling units will be required in this city. Carl, from the EIR, could not tell what that meant because there was a deal for these 112/units. However, I am pretty sure it happens to be units to rehabilitate the Pink Palace, the credits which were \$4,000 a credit. So basically you're talking 112 credits times \$4,000 a credit -- this project sponsor will have to contribute \$448,000 for housing mitigation. Again, based on an average price of a house in San Francisco of \$151,000, that would build three houses. If you had 20 percent financing so you could leverage that money, that would buy 15 houses. I would like discussion in this section that the OHPP does not require full housing mitigation; that the actual amount of housing that this will get is either three houses out of 112 or 15 houses out of 112."

"Furthermore, this housing, the Pink Palace, happens to be moving people out of the Pink Palace and putting the elderly in. So we didn't create any new housing as part of this project. I think it is misleading for someone to donate \$4,000 and make it look like they built an entire new unit of housing. And I would like a discussion of that in the EIR so the public is aware that this is partial mitigation."

Commissioner Bierman: "[On page 3, the] explanation of housing credits seems inadequate. [It] doesn't explain what [the] agreement with Mr. Macris is."

RESPONSE

Commissioner Bierman's comments reference the Summary; the housing mitigation measure is explained in greater detail in the EIR on p. 92. The following two paragraphs have replaced the existing paragraph in the EIR on p. 92 under HOUSING:

"MEASURE PROPOSED AS PART OF THE PROJECT:

"The project sponsor, Highfield Holdings, Inc., and California Jones Co. were together awarded 610 housing credits according to a January 27, 1982 agreement with the City and County of San Francisco signed by Dean Macris, Director of Planning. The agreement awards these credits on the condition that the two firms make available \$2,440,000 to the City Housing Authority upon 60 days written notice from the Authority, not more than 90 days before commencement of construction. These funds would be used "to

VIII. Summary of Comments and Responses

rehabilitate and convert units within the Yerba Buena Annex Housing Project from their current use and condition to residential units for senior citizens." (Quote from text of the January 27, 1982 agreement). The agreement allows Highfield Holdings, Inc. and California Jones Co. to assign or transfer their credits in compliance with the OHPP guidelines. Highfield was awarded 377 housing credits from this agreement, and it will apply 112 to help meet the housing demand generated by this project as calculated with the DCP formula."

The rationale for the use of housing credits versus housing units is specifically addressed in the "Office/Housing Production Program Interim Guidelines" issued by the Department of City Planning in January, 1982: "The Commission is cognizant of the financial gap between affordable rents and amortization of development costs (including but not limited to, architectural and other professional fees, construction costs and interest) and the lack of continuing governmental subsidies to construct affordable housing. The Commission, therefore, finds that economic considerations dictate that economic incentives be given to promote and stimulate the production of affordable housing. Hence, a multiple credits mechanism has been designed to offset partially the development cost of producing affordable housing."

The mitigation measure uses the term "credits" rather than units in order to be consistent with the above-mentioned City Guidelines. This program is intended to achieve City housing goals by obtaining contributions from office developers (either in terms of actual housing units, or contributions to the Shared Appreciation Mortgage Revenue Bond Program). Previous OHPP contributions have resulted in the completion of federally-sponsored projects whose funding was incomplete and which might not have otherwise been constructed. Through the Office of Community Development, which administers the OHPP, additional low- and moderate-income housing rehabilitation projects have been completed or are planned. The varied contributions to the City's housing stock may not directly house project-generated households, but provide indirect benefits by increasing the housing supply and lessening the pressure for increased housing prices.

Transportation

COMMENTS

Commission Vice President Nakashima: "On Pages . . . 92 and 93 . . . , there is absolutely no mitigation on transit."

David Jones: "This EIR actually had one of the best transit analyses I have seen. It painted a horror story. Unfortunately, this EIR did not even contain the normal phrase on transit mitigation about participating in a district. I would like to point that out because I think you should each think of this as you go through the EIR yourselves. This EIR talked about a 43 percent increase in Muni as a result of cumulative impacts; a 36 percent increase in BART; a 64 percent increase in AC Transit; a 67 percent increase in SamTrans -- that would be needed as a result of the cumulative development

VIII. Summary of Comments and Responses

of the projects within 2,000 feet of this project. Those are incredible increases. And I have never seen a transit analysis which . . . came right out and showed them. Unfortunately, the EIR sort of pooh-poohed them and left people driving around in cars or something, because it didn't tie up the loose ends to figure out how the City or the bridges are going to accommodate this.

"This [EIR] doesn't have your standard transportation mitigation about participating in a district.

"I would like a quantitative analysis by the project sponsor or by the Department of City Planning, whoever is responsible for this EIR, of each of the mitigation measures to determine how much reduction will result from each measure.

"You come up with these nice sounding mitigation measures, but as I see them, they're not really going to do a real lot. Here's where you have, for those incredible increases in transportation, a visual signal; red and green lights would be installed at a garage ramp. Is that going to reduce the 8,000 parking place deficit that people are going to be looking for? Is that going to help transit? I mean, it doesn't reduce anything which was found significant in the environmental impact analysis. Curb-to-curb width, same type of thing. A one-way sign. Parking places for three bicycles. So far we have not mitigated any transportation or transit.

"Now here comes a mitigation measure. A transportation broker, on-site sale of BART and Muni passes. That encourages transit use. That does not mitigate use of transit. So that is not a transit mitigation measure. RIDES and a transportation broker. The amount of people in vans and each transportation mode is already assumed in this EIR. So it's already taking into account that a certain number of people will use RIDES or van pools, so that doesn't provide any additional mitigation over what is already anticipated in the EIR analysis. And eye bolts for Muni.

"So here we have transportation. I want a quantitative analysis. I would like to see if this mitigates one passenger worth of transit on any of those systems. We're talking about 43-67 percent increases. I think it will show that these mitigation measures -- which is what this Planning Commission certifies -- that mitigate the adverse impacts you find in the environmental setting chapter will produce no quantitative mitigation for transit or transportation. Even if this developer decided to participate in a fair, equitable funding mechanism for Muni, I would say there is also no assured transit mitigation for this project, because that's in litigation. There has not been one penny received. The projects who took this before the ordinance passed are the ones that are suing. They don't like it. This guy didn't even include it.

"So I think you have a problem with this EIR. It shows the most severe problems of transit of any EIR yet, and the mitigation measures do not mitigate one rider's worth of Muni, SamTrans, Golden Gate Transit, AC, or BART.

"I would also like an analysis when findings are made that mitigation measures in the other areas are mitigating adverse impacts. I would like an analysis of how they are mitigating adverse environmental impacts.

"I would also like to see a basis in this EIR for the findings that this Commission routinely makes that there are overriding concerns because of the jobs created to mitigate any unmitigated adverse environmental impacts. The negative impacts fell on transit, traffic, pedestrian use, air quality, housing costs -- affect 680,000 San Franciscans, commuters in the entire Bay Area. You routinely make findings -- the creation of 300 jobs overrides all that. I have never seen an analysis of those 300 jobs or who they go to, what those benefits are and how they outweigh all the negative impacts of these projects. And I would like to see that in the EIR."

"I think basically what you have here is a project which shows adverse environmental impacts and which doesn't mitigate those [impacts] . . . and no analysis of why they're not going to mitigate the [impacts]. And I would like to see that in the final EIR."

Carl Imparato: "In terms of parking, the developer -- we would like to see a mitigation measure discussing the fact that the developer should contribute, to pay for his share of the costs of running the preferential parking program. Now, people who live in the neighborhoods shouldn't have to pay one penny for a parking permit, because the reason they have to get those parking permits is because these projects downtown are being approved and bringing more and more commuters into their neighborhoods. That's a mitigation measure that should be in the final EIR. You can reject that if you like."

"Transit. There is no required payment for any additional transit costs incurred by Muni in this EIR. We believe there should be a mitigation measure requiring payment for all additional transit costs incurred by the Muni, incurred by all transit agencies in the region; and that the developer should pay for his share of cumulative downtown expansion."

"What have you got here in terms of transit? You've got transit mitigation, eye bolts for the Muni, the Muni wires. Now, I have a question on that. Is that required already by law? Because if it is already required, if you could already get the guy to put eye bolts for Muni wires in there on the building, then that's really not mitigation. What Muni needs to have isn't new eye bolts, it needs to have the demand, the extra demand paid for by the people that cause the demand."

"And, lastly, we ask that you discuss the impacts of all the mitigation measures; and those mitigation measure impacts should be estimated. It's not enough to talk about van pooling. The question is, how much would van pooling reduce the impacts? It's not enough to talk about transit brokers or encouraging transit use. How much do these measures mitigate? Then, the other side of it is, doesn't encouraging transit use only make Muni's problems worse? Muni doesn't need more peak hour passengers; it needs more money. So, actually, transit brokers are basically hurting Muni more than they are helping. That is not Muni mitigation in my book."

RESPONSE

The additional mitigation being asked for by the persons commenting would be necessary to mitigate impacts from cumulative development in the downtown area. As shown in the EIR, the project alone would not have a

significant adverse effect on the regional transit agencies' operating conditions. Two additional mitigation measures have been added to the EIR on p. 93. The text is as follows:

"Project sponsors would comply with any legal measures adopted by the Board of Supervisors for funding of transit development and improvement to meet the peak transit demands caused by cumulative office development in the downtown area.

"Upon completion, and with the help of the Department of City Planning, the project sponsors would encourage tenant firms to implement a flexible time ("flex-time") system for employee working hours (flex-time is designed to reduce peaks of congestion in the transportation system)."

The types of mitigation measures that the persons commenting have requested be quantitatively assessed are all measures that would restructure the travel patterns of persons commuting into the downtown (i.e. flex-time, van pooling, higher transit use). As compliance with any of the measures designed to encourage use of higher-occupancy modes is entirely voluntary on an individual commuter basis, it would not be feasible to predict how many single-occupant auto commuters would shift to higher-occupancy modes as a result of mitigation that could be proposed. Similarly, compliance with flex-time programs would be voluntary, if not on an individual commuter basis, then on an employer basis. The feasibility of predicting actual flex-time changes would be limited.

Transportation brokers are intended to serve as clearing houses for information about commute alternatives (to single-occupant autos). The intent in providing for on-site sale of BART and MUNI passes is to encourage transit use as an alternative to commuting in single-occupant autos. On the basis of existing residential and modal split distributions, the areas with the greatest potential to reduce single-occupant auto commuting are the East Bay, North Bay and Southern Peninsula, where 70% of these commuters live. This shifting of a portion of the drivers to higher-occupancy modes would not necessarily mean an increase of ridership on Muni. Provision of adequate capacity on Muni is a separate issue. Another function of transportation brokers is to provide information about flex-time through which the peak transportation demand can be spread over time. Encouragement of transit and high-occupancy vehicle use can be considered mitigation of auto-related impacts as implementation of the mitigation would reduce the magnitude of single-occupant auto use.

The projections of transportation conditions made in the EIR are based upon existing travel patterns and, consequently, implicitly assume no change for future residential or modal split distributions. Thus, the percentage of persons commuting in car-pools and van-pools has been implicitly assumed to remain unchanged from existing conditions. The mitigation measure encouraging use of van-pools is intended to increase the percentage of persons using van-pools over the existing percentage.

VIII. Summary of Comments and Responses

The intrusion of commuter parking into residential areas and the subsequent establishment of preferential parking zones was not the result solely of expanded office space in downtown but due, in part, to a conscious program to limit the availability of parking downtown in order to encourage use of transit and reduce auto use in the downtown. Removal or prohibition of parking in a single location (the downtown core) will not have the desired effect of reducing auto travel into the City unless there is adequate provision to prevent parking spillover into adjacent areas. The residential parking permit system is an attempt to limit all-day parking on residential streets, consisting in part of displaced downtown parkers. On-street parking in the City of San Francisco (and most cities in California) is a public resource paid for out of the general fund (financed by property tax). A parking space is not the sole property of the resident whose property fronts the street nor does that resident have any implicit claim to the on-street parking space. Thus, forcing a San Francisco landowner (the downtown developer) to pay to protect a San Francisco resident's (whether owner or tenant) parking privilege is not an equitable solution to the parking problem.

Section 15089 of the CEQA guidelines states that:

"(a) CEQA requires the decision maker to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. . . .

"(b) Where the decision of the public agency allows the occurrence of significant effects which are identified in the final EIR but are not mitigated, the agency must state in writing the reasons to support its action based on the final EIR and/or other information in the record. . . .

"(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination."

Overriding considerations need not relate directly to the impacts of a project, but may relate to some general welfare issues, such as the need to provide jobs within the City for the region to reduce regional unemployment. The EIR is not the proper place to develop the argument for overriding considerations.

Air Quality

COMMENT

Carl Imparato: "Finally, in terms of air quality, the developer, as the ultimate cause of traffic increases and pollution increases, because the office building would be an indirect source of emissions, the developer should pay the costs of reducing air pollution by that same amount. Those are mitigation measures that should at least be discussed in the EIR as proposed mitigation."

VIII. Summary of Comments and Responses

RESPONSE

As indicated in Table 5, p. 77 of the EIR, ambient concentrations of air pollutants in the area are expected to decline. This reduction would be due primarily to improved vehicle fleet efficiencies and their pollutant control devices, and emission reductions from stationary sources. With implementation of control strategies presented in the Bay Area Air Quality Management Plan, all pollutant levels, with the possible exception of those for ozone, are expected to be within applicable federal and state standards. As the ambient air quality conditions are projected to improve and the project would not significantly deteriorate air quality, the project would not cause an adverse significant impact in this category. Therefore, CEQA does not require the project sponsor to pay the cost for offsetting or reducing pollutants by a level equivalent to the direct and indirect emissions due to the project.

ALTERNATIVES TO THE PROPOSED PROJECT

Alternative G

COMMENT

Jonathan Malone: "Alternative G is titled "Historic Building Alternative." The Board finds this term confusing, because in the first reading it sounds like a historic building mean[ing] there's a historic building on the site or, secondly, that it is possible to construct a 'historic building,' when in fact a historic building requires history over age.

"We would suggest something such as a 'historically scaled building alternative' might be a better phrase."

RESPONSE

The title of Alternative G on p. 108 has been changed to "Eighty-Foot-High Concrete Building Alternative," and the first sentence has been changed to read: "An alternative of the same height as the adjacent Call Building, and with building materials similar to those of the Call Building, would be a structure of precast concrete about eighty feet in height. This alternative would include a symmetrical arrangement of the New Montgomery St. pedestrian-level features, including the entranceway on New Montgomery St. . . ."

On p. 5 in the EIR, the following change has been made: "G. The Eighty-Foot-High Concrete Building Alternative would be a structure . . ."

(New) Alternative H

COMMENTS

Commission Vice President Nakashima: "On Page 109 on alternatives, I have a request from Sue Bierman and also myself in that we would like to have the project sponsor consider another alternative that would be more complementary to the adjacent Call Building; that there would be a setback at the level of the height of the Call Building and that they would use materials more in keeping with other development and other historic type of buildings in the neighborhood."

Commissioner Bierman: "P. 100 - etc. Alternatives. We need an alternative showing a building with a setback at a compatible height of the Palace [Hotel] and Call Building, and design treatment that [complements] the historic quality of the area, i.e., similar to the treatment the Department has strived for on the lower floors on Market near Civic Center, and in buildings on U.N. Plaza. [It] should be a drawing of a more traditional design, with the New Montgomery facade set back at the height of the Call Building."

RESPONSE

The project was originally proposed with a stepped-top, flat roof design. At the request of the Department of City Planning urban design staff, the top of the building was redesigned with a sloped roof. Other buildings with sloped roofs in the vicinity include:

Hunter-Dulin Building, 111 Sutter St.; A-rated in Splendid Survivors
Citizens Savings, 704 Market St. at Kearny St.; A-rated
St. Patrick's Church, 756 Mission St.; A-rated
Humboldt Bank Building, 783 - 785 Market St.; A-rated
Hobart Building, 582 Market St.; A-rated.

Splendid Survivors, 1979, says of the roof at 111 Sutter St. that "It is this roof which is one of the richest features on the city's skyline."

The exterior building material for the project has been changed from aluminum panels to precast concrete, a building material which the project sponsor and the architect feel would be more compatible with the surrounding buildings.

The project architect feels that the balanced facade design of the project would complement the symmetrical facades of the neighboring buildings (see Figure 12A, p. 117).

This alternative has been added to the EIR on p. 109:

"H. BUILDING WITH SETBACK AT THE HEIGHT OF THE CALL BUILDING

"This alternative would be a building with a setback on the New Montgomery facade aligned with the height of the Call Building (see Figure 25A, p. 109a). The structure would be precast concrete with fenestration the same as is currently proposed. Levels one through seven would be the same

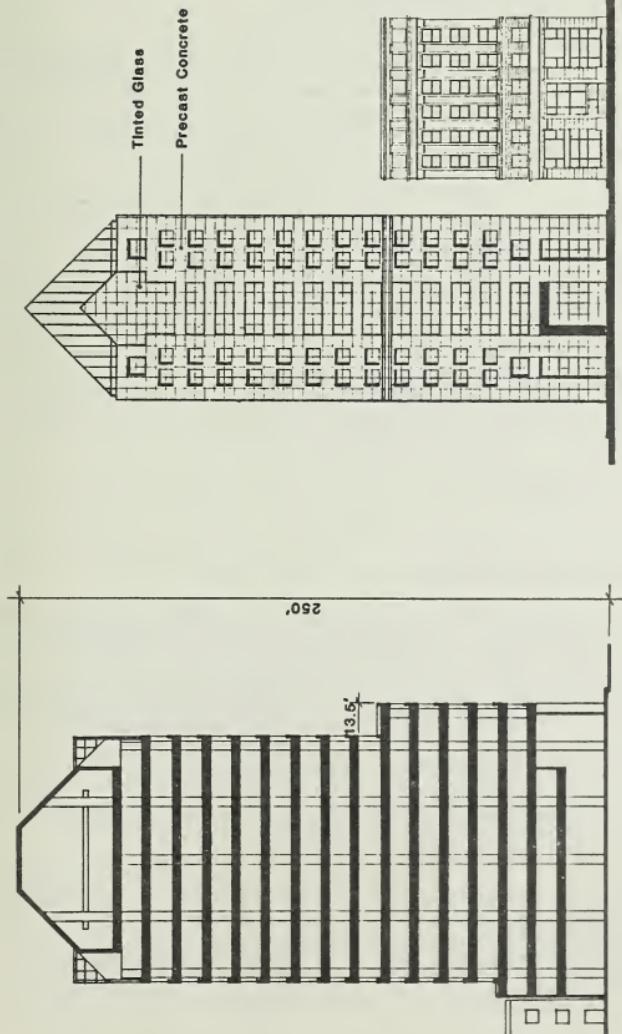


FIGURE 25A: Alternative with Setback at the Height of the Call Building

SOURCE: Geneser and Associates

VIII. Summary of Comments and Responses

as the project; office levels 8 through 15 would be set back 13.5 ft. from the New Montgomery St. sidewalk. The reduction in floor area on levels 8 through 15 would allow the addition of level 16 for office use. This alternative would contain approximately 132,950 gross sq. ft. of floor area, 2,550 sq. ft. less than the proposed project. Building height would increase 12.5 ft. to a total height of 252.5 ft.

"This alternative would increase the length and duration of shadows cast by the building on the Sheraton Palace Garden Court. Other environmental impacts of this alternative regarding employment, housing, and fiscal factors, transportation, air quality, construction noise, geology, energy, and growth inducement would be similar to those described in Section IV., Environmental Impact, pp. 29 - 91.

"The project sponsor feels that the setback alternative is inappropriate for New Montgomery St. since no buildings on the street have a similar setback, including the much taller Pacific Telephone Building. Leasability and tenant planning flexibility would be adversely affected by the less efficient and smaller upper floors (7,850 sq. ft. vs. 8,900 sq. ft.). Therefore, the sponsor has rejected this alternative."

On p. 5 in the EIR the following has been added: "H. The Building with Setback at the Height of the Call Building would be a structure designed with a setback at the height of 80 ft., the height of the Call Building. This alternative would be one story taller than the project; it would be similar to the project in other aspects."

D. STAFF-INITIATED CHANGES

Project Change to No-Parking Alternative

Since publication of the DEIR, the project sponsor has decided to proceed with this project as it is described in Alternative D, the No-Parking Alternative. The sponsor and the project architect have also decided to use precast concrete for the exterior building material, because the texture would be more compatible with the neighboring buildings than the aluminum panels which were originally proposed. Therefore these changes have been made in the EIR.

The following sentence has been added on p. 4 under Alternative D:

"The project sponsor would prefer to build this alternative rather than the project described in II. Project Description. Exterior building materials would be precast concrete."

The following sentence has been added to the second paragraph on p. 104 under D. No-Parking Alternative:

"This alternative is the preferred choice of the project sponsor."

On p. 104, the third paragraph under D has been deleted.

VIII. Summary of Comments and Responses

Figure 24A, Street Level, No-Parking Alternative, has been added as p. 104a of the EIR.

Add the following sentence as a new paragraph at the end of the PARKING discussion on p. 71b:

"The project sponsor prefers the No-Parking Alternative. Therefore, no parking and no basement would be provided."

Traffic Impact of Cumulative Development

The following paragraphs have been added to p. 64a of the EIR following the last paragraph (preceding "PUBLIC TRANSIT"):

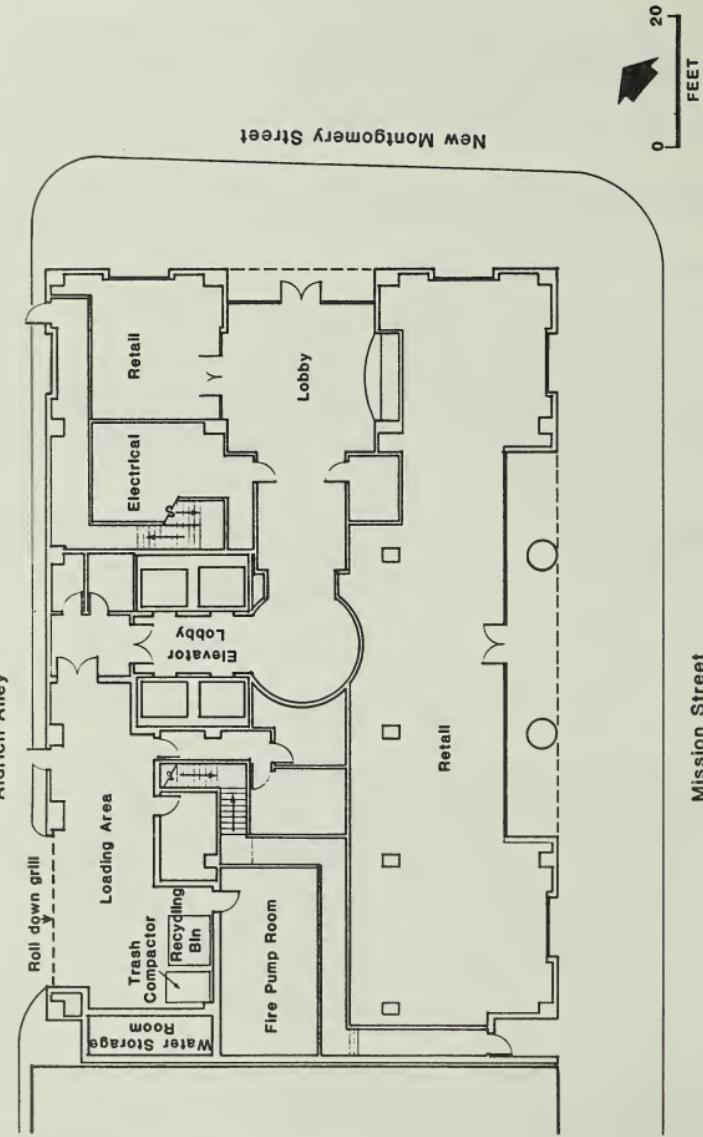
"In this and other San Francisco EIRs, a land-use type of approach has been used to estimate the transportation impacts of both the proposed project and cumulative development. An alternate type of approach is to forecast travel demand based upon regional projections of employment share (employment trend approach).^{3/} Briefly, the fundamental differences between (and Limitations of) the two approaches are:^{3A/}

"The land-use approach (as it has been applied in this EIR) has used net new office space actually proposed or under construction (less space in buildings demolished to make way for new buildings) as the basis for travel generation. The land-use approach assumes that literally all of the currently proposed development in the downtown area will be constructed and fully occupied within the time frame of the 90 New Montgomery Street project development and occupancy. No allowance has been made for less than 100 percent occupancy, for proposed developments that are never constructed, or for those which would not be occupied within the time frame of the 90 New Montgomery Street project.

"The employment trend approach generates a total increase in employment in downtown that has taken account of loss of employment as industries and offices move out of the City, replacement of one type of industry with another (industry shifts), as well as, replacement of existing office space with new office space. The employment trend approach makes no implicit assumptions concerning occupancy rates or actual square footage of development constructed; rather, it generates total employment increases from a standpoint which assigns jobs by metropolitan sector (area) based upon extrapolation of past trends and which considers long-term industry shifts to, within, and away from each area.

"Note that neither of the two approaches has attempted to project future changes in modal split.

"To illustrate the differences in projections resulting from the two approaches, Table 3a, following, shows the total employment projections by the two methods (and the project's share thereof), the regional distribution of trips, and Muni's share of the new transit travel (and the project's share thereof).



SOURCE: Gensler and Associates

FIGURE 24A: No Parking Alternative

"As shown in the table, the employment trend approach predicts about 15% fewer employees in the downtown and about eight percent more riders on the Muni than does the land-use approach. The employment trend approach would thus approximate the transit demand impacts discussed on pp. 65-68 of the EIR. Similar conclusions can be drawn for the other transit agencies.

"Several considerations concerning both of the methods need to be noted. The land-use approach, as it has been applied in San Francisco EIR's, analyzes impacts for the p.m. peak hour, whereas the employment trend approach analyzes the a.m. peak. Several reasons exist as to why one peak (or the other) may be the better one to analyze.

"First, the p.m. peak may be more useful to analyze, in that actual observation shows that the p.m. peak has a greater overall effect on the local street network and transit system in the downtown area than does the a.m. peak, as more travel takes place during the p.m. peak. Also, transit service is more inclined to differ from scheduled times during the p.m. peak than during the a.m. peak, as operational delays have had an 8- to 10-hour period over which to accumulate. Finally, the on-ramps to the freeway/bridge system are greater bottlenecks (in the p.m. peak) than are the off-ramps (in the a.m. peak).

"Conversely, the peaking characteristics of the a.m. peak may be more useful in that they are much sharper than those of the p.m. peak (i.e., a greater percentage of the peak-period travel occurs during a single hour). Also, as a result of the bridge system into San Francisco, travel inbound into the City is much easier to document, as tolls are collected on the inbound direction on the Golden Gate and Bay Bridges. Finally, a greater proportion of the travel occurring during the a.m. peak is employment-related; the p.m. peak includes shopping and pleasure trips which are not affected by increased office space.

"The land-use approach, as it has been used in this EIR, examines the p.m. peak because it has been observed to be the worst case for congestion on the City transportation system. This analysis does not reflect the spreading of the p.m. peak that is currently occurring, as all of the new trips have been assumed to take place in a single hour.

"While the land-use approach assumes all new office space is fully occupied, the assumption of a functional vacancy rate of 5 percent is not uncommon./3A/ With 16.1 million square feet of new office space assumed in the land-use approach to be occupied by 1990, a 5 percent vacancy would amount to approximately 805,000 square feet, representing 3,200 employees (at 250 square feet per employee), 600 of which would ride Muni in the p.m. peak hour. This adjustment for vacancy would thus reduce Muni peak-hour impacts in the cumulative analysis stated above by these 600 riders.

"The land-use approach calculations have assumed transit capacity to be fixed at existing levels. The OER memorandum/3A/ points out, 'It should be recognized that transportation is a more 'elastic' resource with many

TABLE 3a: COMPARISONS OF LAND-USE AND EMPLOYMENT TREND APPROACHES

Approach	Downtown	Project Share*	Regional Trip Share				Muni Peak-hour Increase**	Project Share***
	Employment Increase		S.F.	Pen.	E.B.	N.B.		
Land Use	64,300	0.8%	49%	16%	24%	11%	12,000	1.0%
Empl. Trend+ (maximum)	56,100	0.9%	50-54%	19%	17-21%	10%	12,900++	1.0%

NOTE: As explained in the text, comparisons between the entries for the two approaches must be made with the understanding that the land-use approach reflects increases in employment and transit demand based solely upon increases in downtown office space, while the employment trend approach reflects total increases therein based upon historical trends. The differences among the regional trip share figures reflect these and the other differences between the two approaches.

*Employment generated by the proposed 90 New Montgomery Street project, as a percent of the cumulative downtown-employment increase.

**The Muni peak hour increase is a demand projection (based upon existing and long-term employment trends) that is not dependent upon available or expected transit capacity.

***Muni peak-hour trips generated by the proposed 90 New Montgomery Street project, as a percent of the cumulative downtown Muni peak-hour increase.

+These figures, represent the worst-case analysis under the employment trend approach reviewed and accepted by MTC, ABAG and Muni. Note that the land-use approach entries assume that an additional 16.1 million square feet of office space will come on line by late 1990.

++Based on 54 percent regional trip split to San Francisco (worst-case).

options for expansion including increasing existing capacity by using articulated vehicles, expanded car pool and van pool programs and increasing the peak commuter period through flex-time programs, among others.'

"If future office development does not occur along the lines of the past long-term trends, as assumed in the employment trend approach, then the projections made in Working Paper I would be revised. The average annual growth during the period 1965-1980 was less than the growth per year proposed, approved, or under construction for the period 1980-1984. The employment trend approach assumes average growth through 1990 would be at the lower historic rate, reflecting activity fluctuations from the current rate including slowdowns due to changing business conditions.

VIII. Summary of Comments and Responses

"Until a forecast exists to determine how the current decade's cycle of development may differ from the past, a judgment of the applicability of results from Working Paper I may not be made. Consequently, this EIR has retained the land-use approach and presented this comparison of the employment trend approach. Both methods should be looked upon as describing potential scenarios of future conditions."

Note /3/ on p. 75 of the report has been revised to read:

"/3/ Department of City Planning, Working Paper I, Projection of Long-range Transportation Demand, May, 1982, prepared in cooperation with the Metropolitan Transportation Commission (MTC), the Association of Bay Area Governments (ABAG), and the Municipal Railway (Muni). Employment trend data was compiled by ABAG from trends in County Business Pattern (U.S. Department of Commerce, Bureau of the Census, March 12, 1979), with 1979 as the base year for future projections and regional distributions. Modal split data are from the 1975 Travel Survey prepared by MTC.

The following note has been added to the report on p. 75:

"/3A/ The Department of City Planning, Office of Environmental Review (OER), has issued a memorandum, dated July 2, 1982, dealing with the subject of the differences in the land-use and employment trend approaches, and recommending that both approaches be used in future EIRs "to give a more balanced assessment of future peak transportation demand." This memorandum is on file with and available from the Office of Environmental Review, 450 McAllister St., 5th Floor. The memorandum calls out some of the fundamental differences between the two approaches and also details the limitations of each approach."

Energy

A reference to the following footnote has been added at the end of the second sentence on p. 85. The following footnote has been added as the last footnote on p. 86:

"/6a/ Compliance with the Title 24 prescriptive standards is achieved by constructing the project in accordance with certain physical specifications such as for weatherstripping on doors and windows, and installing appliances and equipment that meet energy efficiency standards. Compliance with the performance standard is achieved by demonstrating that the building's annual energy consumption would not exceed the allowable annual energy budget specified by the California Energy Commission; the energy budget takes into consideration the mix of uses proposed, and is expressed in Btu per sq. ft. of conditioned floor area. Projects that meet the performance standard need not meet the prescriptive standard.

Significant Environmental Effects

On p. 99, this section of the EIR has been revised as follows:

"VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROJECT IS IMPLEMENTED

"TRANSPORTATION

"The loading dock in combination with the parking garage would generate traffic in Aldrich Alley, thereby increasing pedestrian-vehicle conflicts on the New Montgomery St. sidewalk."

Distribution List

On p. 174, the following name has been added to the Distribution List:

"Bureau of Building Inspection
450 McAllister Street
San Francisco, California 94102
Attn: Robert Levy, Superintendent"

A copy of the DEIR was sent to Mr. Levy in the original distribution; his name was omitted from the list in error.

On p. 176, the following names have been added to the Distribution List:

"Laura Wada
1235 Evelyn
Berkeley, California 94706

"Barry Pearl
District 11 Residents Association
1279 23rd Avenue
San Francisco, California 94122

"Michael Strausz
2860 Laguna Street
San Francisco, California 94123

"Perini Corporation
460 Davis Court
San Francisco, California 94111"

Typographic Errors

P. 54, next to the last line; change "110 units" to "112 units."

P. 75, footnote /10/; change "Cahradnik" to "Zahradnik."

IX. EIR AUTHORS, CONSULTANTS, ORGANIZATIONS AND PERSONS CONSULTED

EIR AUTHORS

San Francisco Department of City Planning
45 Hyde Street
San Francisco, California 94102
Environmental Review Officer: Alec Bash
Assistant Environmental Review Officer: Barbara Sahm
Project Coordinator: Paul Rosetter

EIR CONSULTANTS

Environmental Science Associates, Inc.
1390 Market Street, Suite 215
San Francisco, California 94102

(Prime Consultant: Project Description, Urban Design Factors, Employment, Housing, and Fiscal Factors, Transportation, Air Quality, Geology, Seismology, and Hydrology, Construction Noise, Energy, Emergency Response Plan, Cultural, Growth Inducement, Mitigation Measures, Significant Environmental Effects, Alternatives to the Proposed Project.)

Richard Cole	Associate-in-Charge
James R. McCarthy, AICP	Project Manager
Gayle S. Eads	Deputy Project Manager

Donald Ballanti
Certified Consulting Meteorologist
1424 Scott Street
El Cerrito, California 94530

PROJECT SPONSOR

Highfield Montgomery Corporation
2100 1176 West Georgia Street
Vancouver, British Columbia
Canada V6E 4A2

PROJECT ARCHITECT AND ENGINEERS

Gensler and Associates
22 Fourth Street
San Francisco, California 94103

Lee and Praszker
Geotechnical-Foundation Engineers
147 Natoma
San Francisco, California

Glumac and Associates, Inc.
Consulting Engineers
Four Embarcadero Center
San Francisco, California 94111

CITY AND COUNTY OF SAN FRANCISCO

Department of City Planning
100 Larkin Street
San Francisco, California 94102
Dean Macris
Lu Blazej
Richard Hedman
Chi-Hsin Shao
Mary Ann Miller
David Lynch
Gail Bloom

Department of Public Works
Traffic Engineering Division
460 McAllister Street
San Francisco, California 94102
Scott Shoaf
Nelson Wong

X. DISTRIBUTION LIST

REGIONAL AGENCIES

Association of Bay Area
Governments
Hotel Claremont
Berkeley, California 94705

Bay Area Air Quality
Management District
939 Ellis Street
San Francisco, California 94109
Attention: Irwin Mussen

Bay Area Rapid Transit District
800 Madison Street
Oakland, California 94607

Golden Gate Bridge Highway
and Transportation District
P.O. Box 9000, Presidio Station
San Francisco, California 94129

Metropolitan Transportation Commission
Hotel Claremont
Berkeley, California 94705

San Francisco Bay Transportation
Terminal Authority
P.O. Box 3366, Rincon Annex
San Francisco, California 94119
Attention: Herb Okubo

San Mateo County Transit
District
400 South El Camino
San Mateo, California 94402

Alameda-Contra Costa Transit
District
508 - 16th Street
Oakland, California 94612

CITY AND COUNTY OF SAN FRANCISCO

City Planning Commission
100 Larkin Street
San Francisco, California 94102
Attention:
Toby Rosenblatt, President
Susan Bierman
Roger Boas
Norman Karasick, Alternate for
Roger Boas
Eugene Kelleher, Alternate for
Richard Sklar
Jerome Klein
Yoshio Nakashima
C. Mackey Salazar
Richard Sklar
Lee Woods, Commission Secretary

San Francisco Landmarks Preservation
Advisory Board
100 Larkin Street
San Francisco, California 94102

Attention:
Patrick McGrew, President
Phillip P. Choy
David M. Hartley
Carolyn Klemeyer
Jean E. Kortum
Elizabeth de Losada
John Ritchie
Ann Sabiniano
Walter Sontheimer
Jonathan Malone, Secretary

San Francisco Water Department
Distribution Division
425 Mason Street
San Francisco, California 94102
Attention: George Nakagaki, Manager

San Francisco Fire Department
260 Golden Gate Avenue
San Francisco, California 94102
Attention: Joseph Sullivan, Chief
Support Services

San Francisco Department of
Public Works
Traffic Engineering Division
460 McAllister Street
San Francisco, California 94102
Attention: Scott Shoaf

San Francisco Department of
Public Works
Mechanical Section
45 Hyde Street, #222
San Francisco, California 94102
Attention: Ray G. Danehy

MUNI Planning Division
949 Presidio Avenue, #204
San Francisco, California 94115
Attention: Peter Straus

San Francisco Committee for
Utility Liaison (CULCOP)
c/o GES - Utility Liaison
City Hall, Room 363
San Francisco, California 94102
Attention: Herman Beneke

Economic Development Council
480 McAllister Street
San Francisco, California 94102
Attention: Richard Goblirsch

San Francisco Public Utilities
Commission
949 Presidio Avenue
San Francisco, California 94115
Attention: Flint Nelson

San Francisco Public Utilities
Commission
City Hall, Room 287
San Francisco, California 94102
Attention: Richard Sklar

San Francisco Real Estate Department
450 McAllister Street, Room 600
San Francisco, California 94102
Attention: Wallace Wortman
Director of Property

● Bureau of Building Inspection
450 McAllister Street
San Francisco, California 94102
Attn: Robert Levy, Superintendent

GROUPS & INDIVIDUALS

American Institute of Architects
Northern California Chapter
790 Market Street
San Francisco, California 94102

Bay Area Council
348 World Trade Center
San Francisco, California 94111

Building Owners and Managers
Association
690 Market Street
San Francisco, California 94104
Attention: Elmer Johnson

Building Service Employees Union
Local 87
240 Golden Gate Avenue
San Francisco, California 94102

Charles Hall Page and Associates
364 Bush Street
San Francisco, California 94104

Downtown Senior Social Services
295 Eddy Street
San Francisco, California 94102

Downtown Association
582 Market Street
San Francisco, California 94104
Attn: Lloyd Pflueger, Manager

Economic Opportunity Center
District Council V
1173 Mission Street
San Francisco, California 94103
Attn: Lee Meyerzove, Chairman

Environmental Impact Planning Corp.
319 Eleventh Street
San Francisco, California 94103

The Foundation for San Francisco's
Architectural Heritage
2007 Franklin Street
San Francisco, California 94109
Attn: Grant Dehart, Executive Director

X. Distribution List

Friends of the Earth
1045 Sansome Street
San Francisco, California 94111
Attention: Connie Parrish

Gray Panthers
944 Market Street
San Francisco, California 94102
Attention: W. Nunnally

Gruen Gruen & Associates
564 Howard Street
San Francisco, California 94105
Attention: Carrie George

Sue Hestor
4536 - 20th Street
San Francisco, California 94114

Junior Chamber of Commerce
251 Kearny Street
San Francisco, California 94108

League of Women Voters
12 Geary Street, Room 605
San Francisco, California 94108

Legal Assistance to the Elderly
944 Market Street, #803
San Francisco, California 94102

Mr. Gerald Owyang
1517 Reed Avenue, #2
San Diego, California 94118

Mrs. G. Bland Platt
339 Walnut St.
San Francisco, California 94118

San Francisco Beautiful
41 Sutter Street
San Francisco, California 94104
Attn: Mrs. H. Klussman, President

San Francisco Building and
Construction Trades Council
400 Alabama Street, Room 100
San Francisco, California 94110
Attention: Stanley Smith

San Francisco Chamber of
Commerce
465 California Street
San Francisco, California 94102
Attention: Richard Morten

San Francisco Ecology Center
13 Columbus Avenue
San Francisco, California 94111

San Francisco Labor Council
3068 - 16th Street
San Francisco, California 94103
Attention: Bernard Speckman

San Francisco Planning and Urban
Research Association
312 Sutter Street
San Francisco, California 94108

San Francisco Convention and
Visitors Bureau
1390 Market Street, Suite 260
San Francisco, California 94102
Attn: R. Sullivan, Manager

San Francisco Downtown Market Street
Improvement Association
17 Drumm Street
San Francisco, California 94111
Attention: Ralph Leon Isaacs

San Francisco Forward
690 Market Street
San Francisco, California 94104
Attention: Frank Noto

San Francisco Tomorrow
88 First Street, Room 600
San Francisco, California 94105

San Franciscans for Reasonable
Growth
88 First Street, Room 600
San Francisco, California 94105

San Francisco Retail Merchants
Association
582 Market Street, Suite 1001
San Francisco, California 94104

Senior Escort Program
South of Market Branch
814 Mission Street
San Francisco, California 94103
Attention: Leslie Halford
Neighborhood Coordinator

Sierra Club
530 Bush Street
San Francisco, California 94108
Attention: Becky Evans

Tenants and Owners Development
Corporation
177 Jessie Street
San Francisco, California 94105
Attention: John Elberling

● Sheraton Palace Hotel
639 Market Street
San Francisco, California 94105
Attention: Thomas DeAngelo,
General Manager

● Laura Wada
1235 Evelyn
Berkeley, California 94706

● Barry Pearl
District 11 Residents Association
1279 23rd Avenue
San Francisco, California 94122

● Michael Strausz
2860 Laguna Street
San Francisco, California 94123

● Perini Corporation
460 Davis Court
San Francisco, California 94111

Joseph R. Coriz
2853 22nd Street
San Francisco, California 94110

NEIGHBORING PROPERTY OWNERS

Rheba Shein and Edward Zabel
c/o Harold Shein & Co.
5 Third Street, #214
San Francisco, California 94103

Myers & Company
c/o Maxwell A. Myers
658 Howard Street
San Francisco, California 94105

Crocker National Bank
c/o Tax Department
79 New Montgomery Street
San Francisco, California 94105

Henry E. Keyes Trust
c/o Michael Carney
74 New Montgomery, #102
San Francisco, CA 94105

Rialto Properties
116 New Montgomery Street
San Francisco, California 94105

Edward J. Conner
145 Montgomery Street, 2nd Floor
San Francisco, California 94104

MEDIA

San Francisco Bay Guardian
2700 19th Street
San Francisco, California 94110
Attn: Patrick Douglas, City Editor

San Francisco Chronicle
925 Mission Street
San Francisco, California 94103
Attention: Marshall Kilduff

San Francisco Examiner
110 Fifth Street
San Francisco, California 94103
Attention: Gerald Adams

San Francisco Progress
851 Howard Street
San Francisco, California 94103

The Sun Reporter
1366 Turk Street
San Francisco, California 94115

LIBRARIES

EPA Library
215 Fremont Street
San Francisco, California 94105
Attention: Jean Ciriello

X. Distribution List

Government Documents Section
Stanford University Library
Stanford, California 94305

Government Publications Dept.
San Francisco State University
1630 Holloway Avenue
San Francisco, California 94132

Hastings College of the Law - Library
198 McAllister Street
San Francisco, California 94102

Institute of Government Studies
1209 Moses Hall
University of California
Berkeley, California 94720

Golden Gate University Library
550 Mission Street
San Francisco, California 94105

City College of San Francisco
Downtown Center
Fourth and Mission Streets
San Francisco, California 94103

San Francisco, Public Library (2c)
Documents Department
200 Larkin Street
San Francisco, California 94102
Attention: Faith Van Liere

University of San Francisco
Gleeson Library
Golden Gate and Parker Avenue
San Francisco, California 94115

PROJECT SPONSORS

Andy Molloy
Highfield Montgomery Corporation
10711 Cambie Road Suite 260
Vancouver, British Columbia
Canada V6X 3G5

PROJECT ARCHITECTS

Peter Gordon
Gensler and Associates
22 Fourth Street
San Francisco, California 94103

SAN FRANCISCO
CITY PLANNING COMMISSION
RESOLUTION NO. 9551

WHEREAS, A draft environmental impact report, dated August 26, 1982, has been prepared by the Department of City Planning in connection with

81.492E: 90 New Montgomery Street; Demolish 2-level parking garage and construct a 15-story, 240-foot building containing a total of about 135,000 sq. ft. including approximately 124,300 sq. ft. of offices, 3,350 sq. ft. of retail space, and a 11,500 sq. ft. basement providing 23 parking spaces

on the property described as follows:

90 New Montgomery Street, northwest corner of Mission Street, Lot 16 in Assessor's Block 3707; and

WHEREAS, The Department duly filed a notice of completion of the draft report with the Secretary of the California Resources Agency, gave other notice and requested comments as required by law, made the report available to the general public and satisfied other procedural requirements; and

WHEREAS, The City Planning Commission held a duly advertised public hearing on said draft environmental impact report on June 24, 1982, at which opportunity was given for public participation and comments; and

WHEREAS, based upon the draft environmental impact report, any consultations and comments received during the review process, any additional information that became available, and a response to any comments that raised significant points concerning effects on the environment, a final environmental impact report, dated September 2, 1982, had been prepared by the Department, all as required by law; and

WHEREAS, the Commission on November 4, 1982, rescinded Resolution No. 9501 which certified the Final EIR of September 2, 1982 and which found no significant effect on the environment; and

WHEREAS, On November 4, 1982, the Commission again reviewed the final environmental impact report, and found that the contents of said report and the procedures through which it was prepared, publicized and reviewed comply with the provisions of the California Environmental Quality Act, the Guidelines of the Secretary for Resources and San Francisco requirements; and

WHEREAS, As a result of the impacts disclosed in the EIR concerning the project described as the proposed project, the project sponsor has indicated that the presently preferred alternative is that described and analyzed in the EIR as Alternative D, which would be virtually identical to the proposed project except that the basement parking area and the ramp to it would not be included;

THEREFORE, BE IT RESOLVED, That the City Planning Commission does hereby find that the Final Environmental Impact Report, dated November 4, 1982, concerning 81.492E, 90 New Montgomery, is adequate, accurate and objective, and does hereby CERTIFY THE COMPLETION of said Report in compliance with the California Environmental Quality Act and the State Guidelines;

AND BE IT FURTHER RESOLVED, That the City Planning Commission does hereby make the following findings:

1. Energy. Although the DEIR indicated that the project would irrevocably commit energy resources that are not now being consumed on-site, the EIR documents the fact that the project will comply with Title 24 of the California Administrative Code concerning energy standards, the project includes use of energy-saving devices such as sun control devices, solar grey glass and other measures to reduce energy consumption, and, therefore, the project will not use energy in a wasteful manner. Therefore, the Commission finds that the project will not have a significant impact on energy.

2. Construction Noise. The DEIR indicated that construction of the building would increase noise in the surrounding area. There is information contained in the FEIR showing that the project will meet requirements of the City Noise Ordinance. Of particular concern is the construction noise from pile-driving, a short-term temporary effect that will last no more than four (4) weeks. The Commission finds that construction noise will not be a significant environmental impact.

3. Urban Design. The DEIR indicated that the project would have an unavoidable impact in that it casts new shadows on buildings and sidewalks in the surrounding area. The FEIR shows, and the Commission agrees, that the most important of these shadows are the ones that would affect the glass roof of the Garden Court Restaurant in the Sheraton Palace Hotel. The EIR analysis indicates that the project-caused shadows would occur for a maximum of two and one-half (2-1/2) hours, from 7:30 a.m. to 10:00 a.m., for one (1) month in the Fall and entire roof at any time. The Commission finds that the amount of environmental effect and further finds that all shadows caused by the project would not be a significant impact in that they do not affect any public area which may be sensitive to shadows.

4. Transportation. Although the DEIR indicated that the 215 additional person trips on the MUNI System would be an unavoidable environmental impact, the FEIR states that these additional trips would be less than one percent (1%) of the existing MUNI trips on lines serving the project area. As the level of accuracy of transportation estimates assumes more than a one percent (1%) error, the increase due to this project would not significantly change MUNI ridership and would not cause significant environmental impacts.

AND BE IT FURTHER RESOLVED, That the City Planning Commission finds that the project analyzed in the EIR as Alternative D, which is accepted by the project sponsor as the preferred Alternative and the project before the Commission for approval, will have a significant effect on the environment in that the project will contribute to cumulative impacts on transit and on pedestrian and vehicular traffic produced by development in the downtown area.

I hereby certify that the foregoing Resolution was ADOPTED by the City Planning Commission at its regular meeting of November 4, 1982.

Lee Woods, Jr.
Secretary

AYES: Karasick, Kelleher, Klein, Nakashima, Rosenblatt, Salazar

NOES: Bierman

ABSENT: None

PASSED: November 4, 1982

XII. APPENDICES

A. Architectural Evaluation Surveys.	181
B. Employment, Housing, and Fiscal Factors	183
Table B-1. Major Office Building Construction in San Francisco through 1981 in Gross Square Feet.	183
Table B-2. Projected Effects of Downtown Office Development on Regional Housing Markets, 1982 - 90.	185
C. Transportation.	186
Figure C-1. Photos of Peak-Hour Congestion on Two Muni Lines . . .	186
Table C-2. Existing Worst P.M. Peak-Hour Conditions on Outbound Muni Vehicles (Lines Passing Within 2,000 Ft. of the Site). .	187
Table C-3. Vehicular Levels of Service	188
Table C-4. Project's Peak-Hour Travel by Mode (Person Trips) . . .	189
Table C-5. Pedestrian Flow Regimen	190
Table C-6. List of Projects Proposed, Approved, or Under Construction, within 2000 Ft. of the Site to be Completed by 1984, Included in the Cumulative Analysis of Local Vehicular Traffic, Transit and Pedestrian Effects.	191
Table C-7. Cumulative Office Development in Downtown San Francisco as of August 6, 1982	192
Table C-8. Gross Square Feet of Cumulative Office Development in Downtown San Francisco as of August 6, 1982	195
D. San Francisco Air Pollutant Summary 1978-1980	196
E. Projects Included in Comparative Analysis of Energy Consumption . .	198
F. Tentative Geologic Profile on Site.	199
G. Emergency Care Facilities	200
H. Final Initial Study	201

APPENDIX A: ARCHITECTURAL EVALUATION SURVEYS

The Architectural ratings discussed in the text of this report (see Section III.A., Urban Design Factors; Figure 9, p. 18) represent the results of two separate architectural surveys.

SAN FRANCISCO DEPARTMENT OF CITY PLANNING INVENTORY

Between 1974 and 1976, the San Francisco Department of City Planning conducted a citywide inventory of architecturally significant buildings. An advisory review committee of architects and architectural historians assisted in the final determination of ratings for the 10,000 buildings which were entered in an unpublished 60-volume record of the inventory. The rated buildings have been represented on a set of color-coded maps which identify the location and relative significance of each building surveyed. The maps are available for public inspection at the Department of City Planning.

The inventory assessed the architectural significance of the surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included, but historical associations were not considered. Each building was rated numerically according to its overall architectural significance. The ratings ranged from a low of "0" to a high of "5". Factors considered included architectural significance, urban design context, and overall environmental significance. The architectural survey resulted in a listing of the best 10% of San Francisco's buildings. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best 2% of the City's architecture.

HERITAGE SURVEY

More recently, the Foundation for San Francisco's Architectural Heritage, through its consultants, Charles Hall Page & Associates, Inc., conducted an architectural and historical survey of all downtown structures. In 1979, the inventory results were published in the book *Splendid Survivors*. Criteria considered in rating the buildings include Architectural Significance and Negative Alterations. Summary ratings from "A" to "D" were then assigned to each building on the basis of these scores. The summary ratings indicate the following:

- A. Highest Importance. Individually the most important buildings in downtown San Francisco. All "A" group buildings are eligible for the National Register and have highest priority for City landmark status.

- B. Major Importance. Buildings which are of individual importance by virtue of architectural, historical, and environmental criteria. "B" group buildings may be eligible for the National Register. The Landmarks Preservation Advisory Board considers "B" buildings also to have highest priority for City landmark status.
- C. Contextual Importance. Buildings which are distinguished by their scale, materials, compositional treatment, cornice and other features. Many "C" group buildings may be eligible for the National Register as part of historic districts.
- D. Minor or No Importance. Buildings which are insignificant examples of architecture. Most "D" group buildings are "sites of opportunity."

NOT RATED. Buildings which have been built or suffered insensitive exterior remodelings since 1945.

ARCHITECTURALLY AND/OR HISTORICALLY SIGNIFICANT BUILDINGS IN THE DOWNTOWN

On May 29, 1980, the City Planning Commission by Resolution No. 8600 adopted a list of architecturally and/or historically significant buildings in the Downtown area, based on the above described surveys. The purpose of the list is to advise developers and building owners of the importance the City places upon their conservation and to require special review by the Commission of any plans which would affect any building or buildings on such list.

● TABLE B-1: MAJOR OFFICE BUILDING CONSTRUCTION IN SAN FRANCISCO THROUGH 1981, IN GROSS SQUARE FEET

Year	Total Gross Sq. Ft. Completed	5-Year Total	5-Year Annual Average	Cumulative Total of All Office Buildings	Cumulative Total of All Downtown Office Buildings
Pre-1960		(Net)(a)	(Net)(a)	28,145,000(b)	24,175,000(c)
1960	1,183,000				
1961	270,000				
1962	--				
1963	--				
1964	1,413,000	2,866,000	573,200		
1960-1964		(2,580,000)	(516,000)	30,725,000	26,754,000
1965	1,463,000				
1966	973,000				
1967	1,453,000				
1968	1,234,000				
1969	3,256,000	8,379,000	1,675,800		
1965-1969		(7,541,000)	(1,508,000)	38,266,000	34,295,000
1970	1,853,000				
1971	--				
1972	1,961,000				
1973	2,736,000				
1974	2,065,000	8,615,000	1,723,000		
1970-1974		(7,753,000)	(1,550,000)	46,019,000	42,048,000
1975	536,000				
1976	2,429,000				
1977	2,660,000				
1978	--				
1979	2,532,000	8,157,000	1,631,400		
1975-1979		(7,341,000)	(1,468,000)	53,360,000	49,389,000
1980	1,284,000				
1981	3,029,000	4,313,000(d)	2,156,500(d)		
1980-1981		(3,881,700)(d)	(1,940,850)(d)	57,241,700	53,270,700

(continued on next page)

● TABLE B-1: MAJOR OFFICE BUILDING CONSTRUCTION IN SAN FRANCISCO THROUGH 1982
IN GROSS SQUARE FEET (Continued)

- (a) Net equals 90% of gross. Net new space is added at an increase factor of 90%, since it is assumed that space equal to 10% of a new building is demolished to make land available for the new replacement building.
- (b) Source: San Francisco Downtown Zoning Study, Working Paper No. 1, January 1966, Appendix Table 1, Part 1. For pre-1965, data include the area bounded by Vallejo, Franklin, Central Skyway, Bryant and Embarcadero. Also includes one-third of retail-office mixed use. For post-1964, data include the entire city.
- (c) Gross Floor Space for downtown offices are included for the following functional areas: Financial, Retail, Hotel, Jackson Square, Golden Gateway, Civic Center, South of Market, and Outer Market Street as defined in the cited January 1966 report. For post-1964, the entire area east of Franklin Street is included.
- (d) Two-year total and average.

SOURCE: Department of City Planning, August 1, 1982

● TABLE B-2: PROJECTED EFFECTS OF DOWNTOWN OFFICE DEVELOPMENT ON REGIONAL HOUSING MARKETS, 1982-90

	Net Project Demand in 1985	Gross		Net Housing Stock Growth 1982-1990(d)		Demand as a Percent of Growth, 1982 to 1990 Project Cumulative	
		Cumulative Demand 1982 to 1990(c)		No. Units	No. Households		
		No. Emp.	No. Households				
San Francisco (a)	55 to 110	9,700 to 25,800	6,900 to 14,300	12,000		0.5 to 0.9 57.5 to 119.2	
Peninsula (b) (San Mateo and Santa Clara Counties)	70	11,600	8,900	87,600		0.1 10.2	
East Bay (b) (Alameda and Contra Costa Counties)	115	19,300	14,900	111,800		0.1 13.3	
North Bay (b) (Marin and Sonoma Counties)	45	7,700	5,900	36,800		0.1 16.0	
TOTAL	285 to 340	48,300 to 64,400	36,600 to 44,000	248,200		0.1 14.7 to 17.7	

(a) Range of San Francisco employees and households based on 101 Montgomery Street Final EIR, EE 80-26, Certified May 7, 1981 (15-30% of all employees would reside in San Francisco and 1.4 workers would occupy each household) and "Office Housing Production Program (OHPP) Interim Guidelines," Department of City Planning, January 22, 1982 (40% of all employees would reside in San Francisco and 1.8 workers would occupy each household).

(b) Distribution of employees based on weighted average of expected employees in Federal Reserve Bank (EE 78-207), 101 California Street (EE 78-22), Pacific Gateway, (EE 78-61), and Crocker National Bank (EE 78-298), from 456 Montgomery Street Final EIR (EE 78-178) p. 167 (18% in the Peninsula, 30% in the East Bay, and 12% in the North Bay). Number of workers per household in these counties is assumed to be 1.3 based on 1980 Census data.

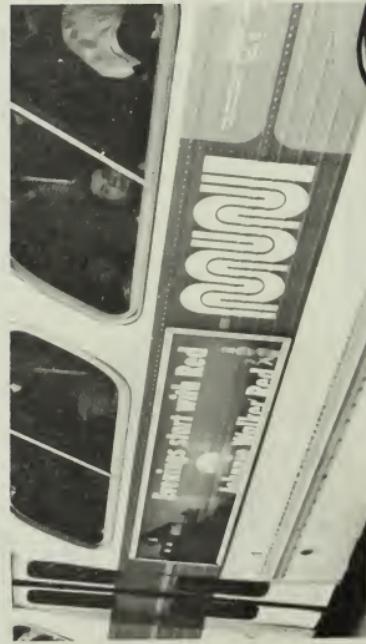
(c) Cumulative demand is based on a list of downtown office projects containing 50,000 gross sq. ft. or more and is available for public review at the Office of Environmental Review, 450 McAllister St., Fifth Floor, San Francisco. Total office space considered in this analysis is was about 16.5 million gross sq. ft.

(d) Net housing stock growth based on "Projections 79," Association of Bay Area Governments, January 1980. Projections contained in that document for 1980-1990 were prorated to reflect 1982-1990 net housing stock growth.



K Ingleside - Van Ness Station

Wednesday, September 9, 1981 - 8:00 A.M. - Inbound



38 Geary - Van Ness Ave. and O'Farrell St.

Wednesday, October 21, 1981 - 9:00 A.M. - Inbound



N Judah - Van Ness Station

Wednesday, September 16, 1981 - 5:00 P.M. - Outbound

38 Geary - Van Ness Ave. and Geary Blvd.

Wednesday, October 21, 1981 - 4:20 P.M. - Outbound

TABLE C-2: EXISTING WORST P.M. PEAK-HOUR CONDITIONS ON OUTBOUND MUNI VEHICLES (Lines Passing Within 2,000 Feet of the Site)*

<u>Lines</u>	<u>Condition</u>
2, 3, 12, 14, 14X, 15, 38L, 45, 59, 60, 61	Passenger loading is more than 100% of the recommended maximum;** there is at least one standee for every two seated patrons. In the aisle, physical contact and conflicts are unavoidable. Crowding occurs at doors, delaying boarding or departure of patrons at some stops.
1, 1X, 11, 14GL, 30, 30X, 31X, 38, 38AX, 42, 80X, K, L, M, N	Passenger loading is 80-100% of the recommended maximum;** there are standees and seldom a vacant seat. In the aisle, standees do not touch each other but are uncomfortably close together on some lines. Movement in the aisle results in some physical contact when conflicts occur. Crowding occurs at doorways on some lines but seldom results in delays in boarding or departure.
4, 9, 17X, 27, 38BX, J	Passenger loading is less than 80% of the recommended maximum;** there are standees on some lines and a few vacant seats on others. In the aisle, patrons can avoid physical contact and conflicts, and there is no congestion at doors.

* This table is based on 1980 ridership counts by Muni, with estimated load factors incremented by 0.1 to reconcile them with conditions existing in 1982. The description of conditions for standing patrons is after Fruin, (Designing for Pedestrians) reviewed in English by Pushkarev and Zupan in Urban Space for Pedestrians, MIT Press, 1975.

** The recommended maximum is approximately 150% of seated capacity on buses and 220% on LRV's.

SOURCE: Environmental Science Associates, Inc.

TABLE C-3: VEHICULAR LEVELS OF SERVICE

Level of Service	Description	Volume/Capacity* (v/c) Ratio
A	Level of Service A describes a condition where the approach to an intersection appears quite open and turning movements are made easily. Little or no delay is experienced. No vehicles wait longer than one red traffic signal indication. The traffic operation can generally be described as excellent.	less than 0.60
B	Level of Service B describes a condition where the approach to an intersection is occasionally fully utilized and some delays may be encountered. Many drivers begin to feel somewhat restricted within groups of vehicles. The traffic operation can generally be described as very good.	0.61-0.70
C	Level of Service C describes a condition where the approach to an intersection is often fully utilized and back-ups may occur behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so. The driver occasionally may have to wait more than one red traffic signal indication. The traffic operation can generally be described as good.	0.71-0.80
D	Level of Service D describes a condition of increasing restriction causing substantial delays and queues of vehicles on approaches to the intersection during short times within the peak period. However, there are enough signal cycles with lower demand such that queues are periodically cleared, thus preventing excessive back-ups. The traffic operation can generally be described as fair.	0.81-0.90
E	Capacity occurs at Level of service E. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting up-stream of the intersection and vehicles may be delayed up to several signal cycles. The traffic operation can generally be described as poor.	0.91-1.00
F	Level of service F represents a jammed condition. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration. Hence, volumes of vehicles passing through the intersection vary from signal cycle to signal cycle. Because of the jammed condition, this volume would be less than capacity.	1.00+

* Capacity is defined as Level of Service E.

Source: San Francisco Department of Public Works, Traffic Division, Bureau of Engineering

TABLE C-4: PROJECT'S PEAK-HOUR TRAVEL BY MODE (PERSON TRIPS)

<u>Mode</u>	<u>Percent</u>	<u>Trips</u>
Auto	36	155 *
Muni	29	125 **
Bart	15	65
AC Transit	8	35
Golden Gate Transit		
Buses	5	20
Ferry	1	5
Caltrans Peninsula Train	4	15
Samtrans	2	10
Other	3	10
<hr/> TOTAL	<hr/> 103 ***	<hr/> 440

* 107 vehicle trips at an average occupancy of 1.4 persons.

** The total number of new transit trips due to the project would be greater, due to the displacement from automobile use of persons not associated with the project, through competition for limited available parking and freeway capacity. The estimated total for Muni is 215 person trips.

*** Exceeds 100% due to multi-mode trips, such as Muni transfers to BART, AC Transit, other regional transit systems.

TABLE C-5: PEDESTRIAN FLOW REGIMEN

Flow Regime	Walking Speed Choice	Conflicts	Flow Rate	
			Average*	V/C
Open	Free Selection	None	0.5	0.03
Unimpeded	Some Selection	Minor	0.5- 2	0.03-0.11
Impeded	Some Selection	High Indirect	2- 6	0.11-0.33
Constrained	Some Restriction	Multiple	6-10	0.33-0.56
Crowded	Restricted	High Probability	10-14	0.56-0.77
Congested	All Reduced	Frequent	14-18	0.77-1.00
Jammed**	Shuffle Only	Unavoidable		

*P/F/M = Pedestrians per foot of effective sidewalk width per minute.

**For Jammed Flow, the (attempted) flow rate degrades to zero at complete breakdown.

Note: Effective sidewalk width is the portion of the sidewalk which is actually used for passage. Studies of pedestrian behavior have found that pedestrians stay 1-1.5 feet away from curbs and building faces. Sidewalk obstructions also reduce the effective sidewalk width.

SOURCE: Pushkarev, Boris and Jeffry M. Zupan, Urban Space for Pedestrians, Cambridge, MA, MIT Press, 1975.

● TABLE C-6: ANTICIPATED OFFICE DEVELOPMENT WITHIN A 2,000-FOOT RADIUS OF THE SITE *

Projects under Formal Review 8/6/82

<u>Assessor's Block</u>	<u>Case No.</u>	<u>Project Name</u>
265	81.195ED	388 Market at Pine
269	81.132ED	Russ Tower Addition
270	81.175ED	466 Bush
271		582 Bush
271	81.517	453 Grant
287	81.550D	Sloane Building (C) **
288	81.461ED	333 Bush (Campeau)
288	81.687ED	222 Kearny/Sutter
3705	80.315	Pacific III Apparel Mart
3707	81.492ED	90 New Montgomery
3707	81.245C	New Montgomery Pl.
3708	81.493ED	71 Stevenson at Ecker
3709	81.113ED	Central Plaza

Approved Projects 8/6/82

261	81.249ECQ	333 California
262	81.206D	130 Battery
268	81.422D	250 Montgomery at Pine
311	82.120D	S.F. Federal
3722	81.417ED	144 Second at Minna
3724	81.102E	Holland Ct. (C)
3733	81.2	868 Folsom
3735	80.106	95 Hawthorne (C)
3738	DR80.5	315 Howard
3749	81.18	Marathon - 2nd & Folsom

Projects Under Construction 8/6/82

263	CU79.12	101 California
288	DR80.24	101 Montgomery
289	81.308D	One Sansome
292	DR79.13	Crocker National Bank
312	79.370	50 Grant
3708	80.34	25 Jessie/Ecker Square
3724		Yerba Buena West
3735		Convention Plaza

	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
	Total New	Net New	Total New	Net New
	Constr.	Constr.	Constr.	Constr.
GRAND TOTALS	8,916,150	7,961,500	303,050	152,410

* See Figure 19, p. 67 for area within 2,000 ft. radius of the site.

** (C) - Conversion (generally industrial and/or warehouse to office)

SOURCE: Department of City Planning

● TABLE C-7: CUMULATIVE OFFICE DEVELOPMENT IN DOWNTOWN SAN FRANCISCO AS OF AUGUST 6, 1982

Projects under Formal Review 8/6/82

<u>Assessor's Block</u>	<u>Case No.</u>	<u>Project Name</u>
58	82.234ED	Roundhouse
112	81.258	Ice House Conversion (C)
136	81.245	955 Front at Green
176	81.673	Columbus/Pacific Savoy
228	81.610ED	569 Sacramento (C)
240	81.705ED	580 California/Kearny
265	81.195ED	388 Market at Pine
269	81.132ED	Russ Tower Addition
270	81.175ED	466 Bush
288	81.461ED	333 Bush (Campeau)
288	81.687ED	222 Kearny/Sutter
669	81.667ED	1361 Bush (C)
716	81.581ED	Polk/O'Farrell
3702	81.549ED	1145 Market
3703	81.494ED	1041-49 Market
3707	81.492ED	--[90 New Montgomery]--
3707	81.245C	New Montgomery Place
3708	81.493ED	71 Stevenson at Ecker
3733	82.29E	832 Folsom
3760	81.386	401 6th
3776	81.59	Welsh Commons
3778	81.630ED	548 5th/Brannan
3781	82.99E	Greyhound Bus Terminal
3786	82.33E	655 5th/Townsend
3789	82.31EV	615 2nd/Brannan (C)
9900	81.63	Ferry Building Rehab
9900		Pier One Development
9900		Agriculture Building

Approved Projects 8/6/82

106	81.415ED	1299 Sansome
161	80.191	Mirawa Center
164	81.631D	847 Sansome
164	81.573D	50 Osgood Place
166	CU81.7	222 Pacific (C)
166	80.15	750 Battery
206	81.165D	401 Washington at Battery
227	80.296	Bank of Canton
261	81.249ECQ	333 California
262	81.206D	130 Battery

(continued on next page)

Approved Projects 8/6/82 (continued)

Assessor's Block	Case No.	Project Name
267	81.241D	160 Sansome
268	81.422D	250 Montgomery at Pine
271	81.517	453 Grant
271		582 Bush
294	82.870	44 Campton Place
311	82.120D	S.F. Federal
351	DR79.24	Mardikian/1170-1172 Market
3512	82.14	Van Ness Plaza
3518	81.483V	291 10th St.
3705	80.315	Pacific III Apparel Mart
3709	81.113ED	Central Plaza
3715	82.16EC	121 Steuart
3717	80.349	Spear/Main (160 Spear)
3717	82.82D	135 Main
3722	81.548DE	466 Clementina (C)
3722	81.417ED	144 Second at Minna
3724	81.102E	Holland Ct. (C)
3729	82.860	774 Tehama
3733	81.2	868 Folsom
3735	80.106	95 Hawthorne (C)
3738	DR80.5	315 Howard
3741	82.203C	201 Spear
3749	81.18	Marathon - 2nd & Folsom
3751	77.220	National Maritime Union
3752	77.220	Office Bldg. (YBC SB-1)
3763	81.287V	490 2nd at Bryant (C)
3763	81.381	480 2nd at Stillman (C)
3775	81.147V	338-340 Brannan (C)
3776	81.693EV	539 Bryant/Zoe
3788	81.296Z	690 2nd/Townsend (C)
3787	81.306	252 Townsend at Lusk
3789	81.552EV	625 2nd/Townsend (C)
3794	81.569EV	123 Townsend
3803	81.244D	China Basin Expansion

Projects under Construction 8/6/82

163	81.1	901 Montgomery
164	81.251D	936 Montgomery-(disco)
167		Golden Gateway III
196		736 Montgomery
196	CU79.49	Pacific Lumber Co.
208	81.104EDC	Washington/Montgomery
237	DR80.6	353 Sacramento (Daon)
239	DR80.1	456 Montgomery
240	DR80.16	550 Kearny
263	CU79.12	101 California

(continued on the next page)

Projects under Construction 8/6/82 (continued)

Assessor's Block	Case No.	Project Name
287	81.550D	Sloane Building (C)
288	DR80.24	101 Montgomery
289	81.308D	One Sansome
292	DR79.13	Crocker National Bank
312	79.370	50 Grant
351	79.133	U.N. Plaza
762		Opera Plaza
3702	81.25	1155 Market/8th
3708	80.34	25 Jessie/Ecker Square
3709	80.36	Five Fremont Center
3712	79.11	Federal Reserve Bank
3715		141 Steuart
3717	79.236	101 Mission at Spear
3717		150 Spear
3718	79.12	Pacific Gateway
3724		Yerba Buena West
3735		Convention Plaza

* (C) - Conversion (generally industrial and/or warehouse to office)

SOURCE: Department of City Planning.

● TABLE C-8: GROSS SQUARE FEET OF CUMULATIVE OFFICE AND RETAIL DEVELOPMENT*
IN DOWNTOWN SAN FRANCISCO AS OF AUGUST 6, 1982

<u>Status of Project</u>	Office (Gross Sq. Ft.)		Retail (Gross Sq. Ft.)	
	Total New <u>Constr.</u>	Net New <u>Constr.</u>	Total New <u>Constr.</u>	Net New <u>Constr.</u>
Under Formal Review	4,220,970	3,801,570	310,650	249,150
Approved	5,428,350	4,862,600	187,850	150,310
Under Construction	<u>7,753,050</u>	<u>7,427,350</u>	<u>260,250</u>	<u>136,050</u>
GRAND TOTALS	17,402,370	16,091,520	758,750	535,510

* This category includes all office projects in the greater downtown area and the south of Market area for which a preliminary draft EIR has been submitted to the City for review or for which plans are well defined and all office projects in redevelopment areas that are under construction or for which Land Disposition Agreements have been approved. It does not include projects in Rincon Point - South Beach or Yerba Buena Center Redevelopment Areas for which no Land Disposition Agreements have been approved by the San Francisco Redevelopment Agency Commission as the City will not know precisely what development will be approved in these areas. It does not include Mission Bay as no formal proposal has been submitted to the City.

SOURCE: Department of City Planning.

APPENDIX D: SAN FRANCISCO AIR POLLUTANT SUMMARY 1978-1980

STATIONS: 939 Ellis Street (1978-79) and 900 23rd Street (1980),
San Francisco

<u>POLLUTANT:</u>	<u>STANDARD</u>	<u>1978</u>	<u>1979</u>	<u>1980</u>	
OZONE (O ₃) (Oxidant)					
1-hour concentration (ppm /a/)					
Highest hourly average	(0.10) /b/	0.12 /c,d/	0.11	0.08	0.09
Number of standard excesses	state	2	0	0	
Expected Annual Excess (national)	/d/	0.3	0.0	0.0	
CARBON MONOXIDE (CO)					
1-hour concentration (ppm)					
Highest hourly average	35 /c/	17	20	10	
Number of standard excesses		0	0	0	
8-hour concentration (ppm)					
Highest 8-hour average	9 /c/	9.4	13.8	7.5	
Number of standard excesses		1	1	0	
NITROGEN DIOXIDE (NO ₂)					
1-hour concentration (ppm)					
Highest hourly average	0.25 /b/	0.30	0.16	0.17	
Number of standard excesses		4	0	0	
SULFUR DIOXIDE (SO ₂)					
24-hour concentration (ppm)					
Highest 24-hour average	0.05 /b/	0.024	0.034	0.018	
Number of standard excesses/e,f/		0	0	0	
TOTAL SUSPENDED PARTICULATE (TSP)					
24-hour concentration (ug/m ³ /g/)					
Highest 24-hour average	100 /b/	128	117	173	
Number of standard excesses/f/		1	1	6	
Annual concentration (ug/m ³)					
Annual Geometric Mean	60 /b/	42.6	42.0	52.1	
Annual standard excess		No	No	No	
LEAD					
Calendar quarter concentration (mg/m ³)					
Highest quarterly average	1.5 /c/	1.19	0.95	0.53	
Number of standard excesses		0	0	0	

APPENDIX D (continued)

- /a/ ppm: parts per million.
- /b/ California standard, not to be equaled or exceeded.
- /c/ National standard, not to be exceeded more than once per year (except for annual standards which are not to be exceeded).
- /d/ The national ozone standard was revised from 0.08 ppm to 0.12 ppm in January 1979 and is now expressed in terms of the Expected Annual Excess, a three-year average of annual excesses of the 0.12 ppm value.
- /e/ The sulfur dioxide standard is considered to be exceeded only if there is a concurrent excess of the state ozone or suspended particulate standard at the same station. Otherwise, the national standard of 0.14 ppm applies.
- /f/ Number of observed excess days (measurements taken once every six days).
- /g/ ug/m³: micrograms per cubic meter.

SOURCE: BAAQMD, Air Pollution in the Bay Area by Station and Contaminant; and CARB, California Air Quality Data.

APPENDIX E: PROJECTS INCLUDED IN COMPARATIVE ANALYSIS OF ENERGY CONSUMPTION
(ESTIMATES OF ENERGY CONSUMPTION PER PROJECT)

Project

101 Montgomery	456 Montgomery
Howard & Main	101 Mission
595 Market	Spear/Main
505 Sansome	Post/Kearny
180 Montgomery	135 Main
Golden Gateway	Pacific III
Pacific Gateway	Washington/Montgomery
Daon Building (Battery and Sacramento)	Bank of Canton

SOURCE: Environmental Science Associates, Inc.

APPENDIX F: TENTATIVE GEOLOGIC PROFILE OF SITE

<u>Geologic Material</u>	<u>Approximate Elevation</u> <u>(Feet above or below S.F. Datum)</u>		
Artificial fill (sand and debris)	+14	to	+4 (+ 1)*
Dense windblown dune sands	+4	to	-16 (+ 1)
Marine clays and sands	-16	to	-21 (+ 1)
Dense to very dense sands	-21	to	-71 (+ 11)
Stiff marine clays and dense sands	-71	to	-190 (+ 11)
Surface of bedrock	below -190		

* Variations in depth of each layer are shown in parentheses.

SOURCE: Lee and Praszker, Geotechnical and Foundation Engineers, February 1982, Preliminary Geotechnical Investigation, Proposed New Montgomery Street Office Building, San Francisco, California

APPENDIX G: EMERGENCY CARE FACILITIES

Centers for Casualty Care and Mass Care have been designated by the Mayor's Office of Emergency Services:

MASS CARE FACILITY A location such as a school, from which lodging, feeding, clothing, registration, welfare inquiry, first-aid and essential social services can be provided to disaster victims during the immediate post-disaster period. Operated by the Red Cross, Department of Social Services, School District, Park and Recreation Department, University of San Francisco, and Salvation Army.

CASUALTY CARE FACILITY May be either a Hospital with full capabilities for surgery, X-ray, laboratory, etc. for treating major injuries or may be a First Aid Station with lesser capabilities for treating less-severe injuries. These facilities are comprised of both private and public agencies.

The MASS CARE FACILITY closest to the project:

Potrero Hill Middle School, 655 DeHaro at 18th.

The CASUALTY CARE FACILITIES closest to the project:

San Francisco City Clinic, 250 4th Street.
South of Market Health Center, 551 Minna.

SOURCE: City & County of San Francisco Earthquake Response Plan
Mayor's Office of Emergency Services

APPENDIX H: INITIAL STUDY

The building design has been modified since preparation of the Initial Study. The project sponsor and the project architect have responded to concerns of the Department of Public Works about the functional design of the loading dock by widening the alley and reducing the footprint of the building. Other design changes have also been made in the plans.



DEPARTMENT OF CITY PLANNING

100 LARKIN STREET · SAN FRANCISCO, CALIFORNIA 94102

(415) 552-1134

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: January 22, 1982*

Lead Agency: City and County of San Francisco, Department of City Planning
100 Larkin Street, San Francisco, CA. 94102

Agency Contact Person: Paul Rosetter

Tel: (415) 552-1134

Project Title: 81.492E

Project Sponsor: Highfield Development
Colorado, Inc.

90 New Montgomery Office Building

Project Contact Person: Peter Gordon
Gensler and Associates

Project Address: 90 New Montgomery Street at Mission Street

Assessor's Block(s) and Lot(s): Assessor's Block 3707, Lot 16

City and County: San Francisco

Project Description: Demolish 2-story parking garage and construct a 15-story, 202-foot building containing a total of about 144,400 sq. ft., including approximately 127,800 sq. ft. of offices, 4,800 sq. ft. of retail space, and a 9,600 sq. ft. basement providing 25 parking spaces.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15081 (Determining Significant Effect), 15082 (Mandatory Findings of Significance) and 15084 (Decision to Prepare an EIR), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: February 1, 1982*.

An appeal requires 1) a letter specifying the grounds for the appeal, and 2) a \$35.00 filing fee.

*BECAUSE OF THE LATE MAILING OF THIS DOCUMENT, THE DEADLINE FOR APPEALING THIS DETERMINATION IS EXTENDED TO FEBRUARY 8, 1982.

Alec S. Bash, Environmental Review Officer

INITIAL STUDY
90 NEW MONTGOMERY OFFICE BUILDING
81.492E

PROJECT DESCRIPTION

Highfield Development Colorado, Inc. proposes to construct an office building with street-level retail uses at the northwest corner of the intersection of New Montgomery and Mission Sts. (see Figure 1). The site is currently used as a three-level parking garage and encompasses Lot 16 of Assessor's Block 3707. It is in the C-3-O (Downtown Office) Use District and the 500-I Height and Bulk District; permitted floor area ratio (FAR) for the site is 14:1.

The site is an irregular rectangle with frontages of approximately 80 ft. on New Montgomery St. and 115 ft. on Mission St., and is approximately 9,800 sq. ft. in area. It is bounded on the north by Aldrich Alley. This passageway is 12 ft. wide, including a seven-ft.-wide driveway with 2.5-ft.-wide sidewalks on both sides. With project implementation, the passageway between the two buildings would be widened to 14.5 ft. for the length of the site, including a ten-ft.-wide driveway and a two-ft.-wide sidewalk adjacent to the project.

The proposed 15-story building would be 240 ft. tall including the mechanical penthouse; it would contain approximately 144,400 gross sq. ft. of floor area, including one basement floor. The structure would be rectilinear in form (see Figures 2 and 3); design details for the base and the top of the building have not been finalized. The building exterior above ground level would consist of colored aluminum spandrel panels with tinted glass. Clear glass would be used on the main floor. The ground floor would contain approximately 4,770 gross sq. ft. of retail space, the lobby providing access to offices on the upper floors, and an off-street loading dock (see Figure 4). The basement would contain 9,565 sq. ft. of parking area and 810 sq. ft. of storage and mechanical equipment space (see Figure 5). Each of the upper 14 floors would contain about 9,125 gross sq. ft. for a total of 127,800 gross sq. ft. of office space. Approximately 520 people would be employed at the site.

Three pedestrian entrances would be located along the New Montgomery frontage of the building; two would provide access to the building lobby and one would provide access to the retail space located in the northeastern corner of the ground floor. Two pedestrian entrances along the Mission St. frontage would provide access to the retail space located in the western portion of the ground floor of the building. Retail space would have clear glass windows along the sidewalk; upper levels would have windows on all four sides.

From New Montgomery St. which is one-way southbound, cars would enter the parking garage in the basement via a one-lane ramp with access from Aldrich Alley, the one-lane street adjacent to the site on the north. When leaving the garage, cars would enter New Montgomery St. via the ramp and Aldrich Alley. There would be 25 parking spaces including one oversized space designated for handicapped persons. Parking space is currently provided in the existing basement including space under the public sidewalk along New Montgomery and Mission Sts.; this existing arrangement would be continued with the basement plan as proposed in the project.

A loading dock would be provided with access from Aldrich Alley. Pursuant to discussions with the Department of Public Works, the alley would be widened to facilitate access to the dock. To unload, trucks would turn right from New Montgomery St. onto Aldrich Alley, drive about 150 ft. down the passageway, and back into the loading dock area. For egress, the trucks would continue westward down Aldrich Alley, turn left onto Annie St., and right onto Mission St.

Project sponsor is Highfield Development Colorado, Inc., a subsidiary of Highfield Corporation Ltd., a Canadian corporation based in Vancouver, British Columbia. Project architects are Gensler and Associates, San Francisco, California.

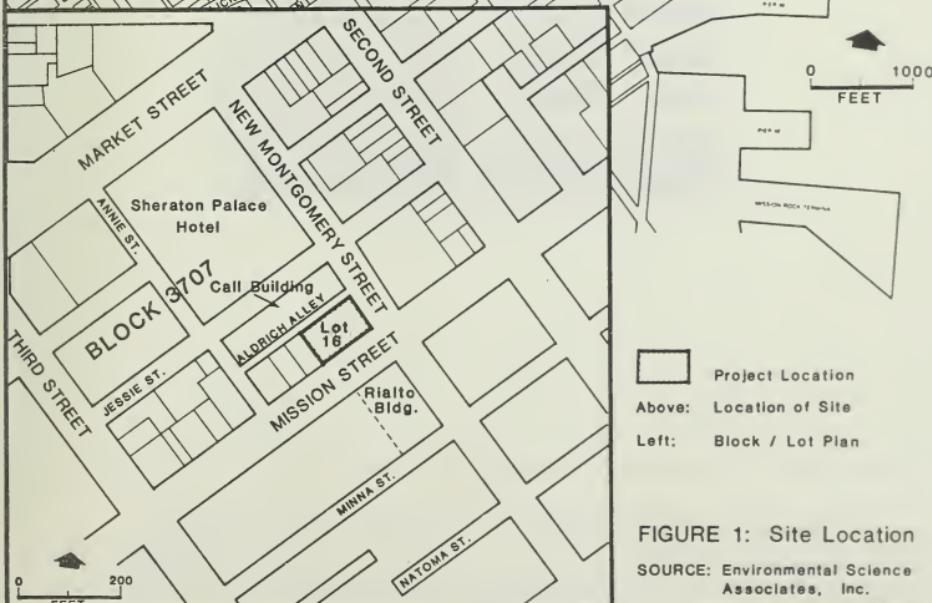
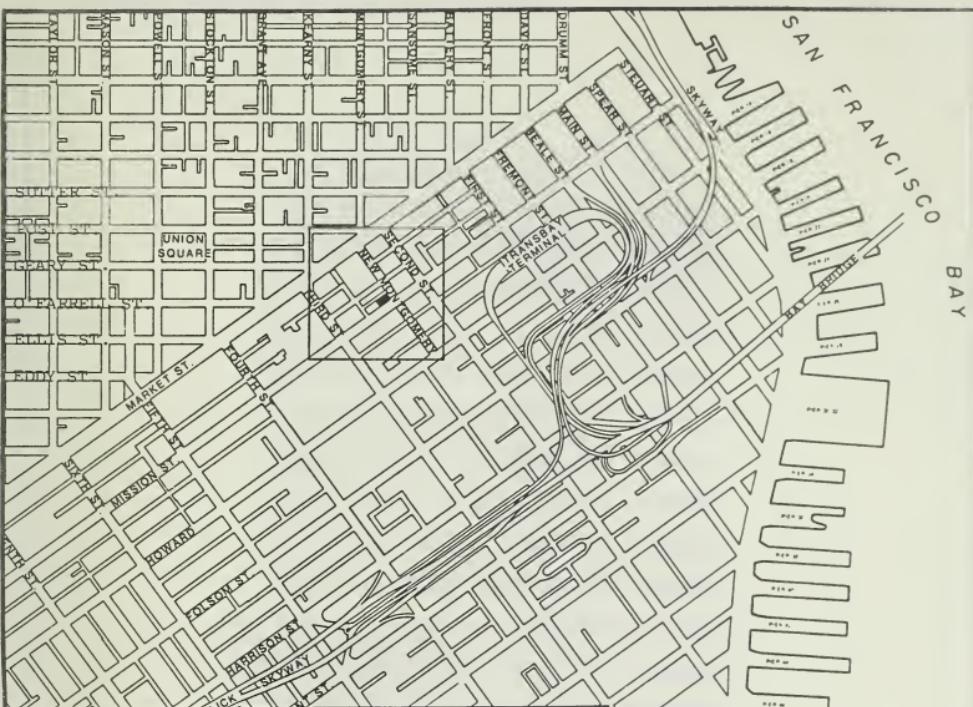
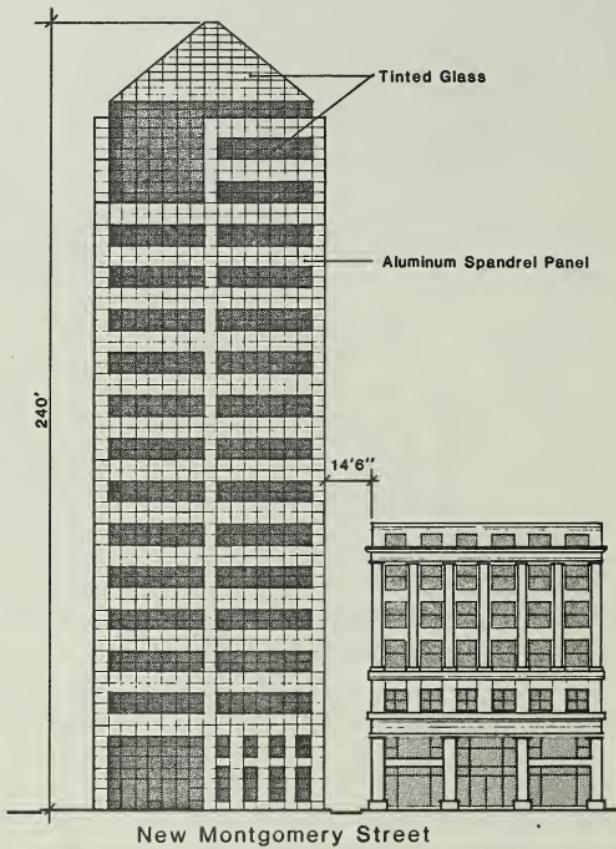


FIGURE 1: Site Location

SOURCE: Environmental Science
Associates, Inc.



0 20
FEET

FIGURE 2: East Elevation

SOURCE: Gensler and Associates,
Architects

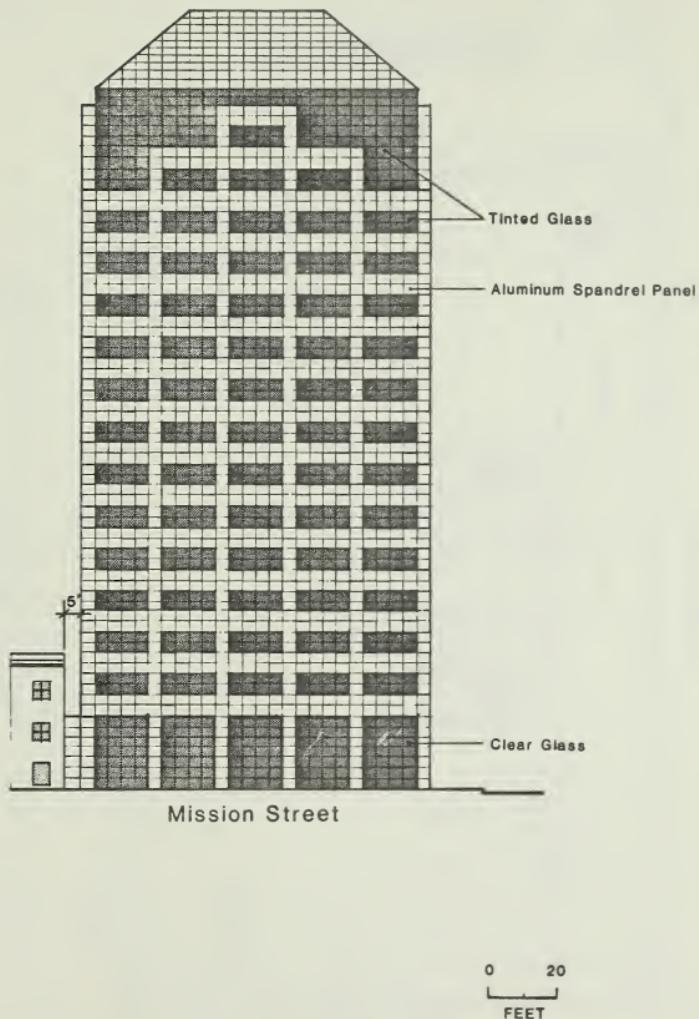
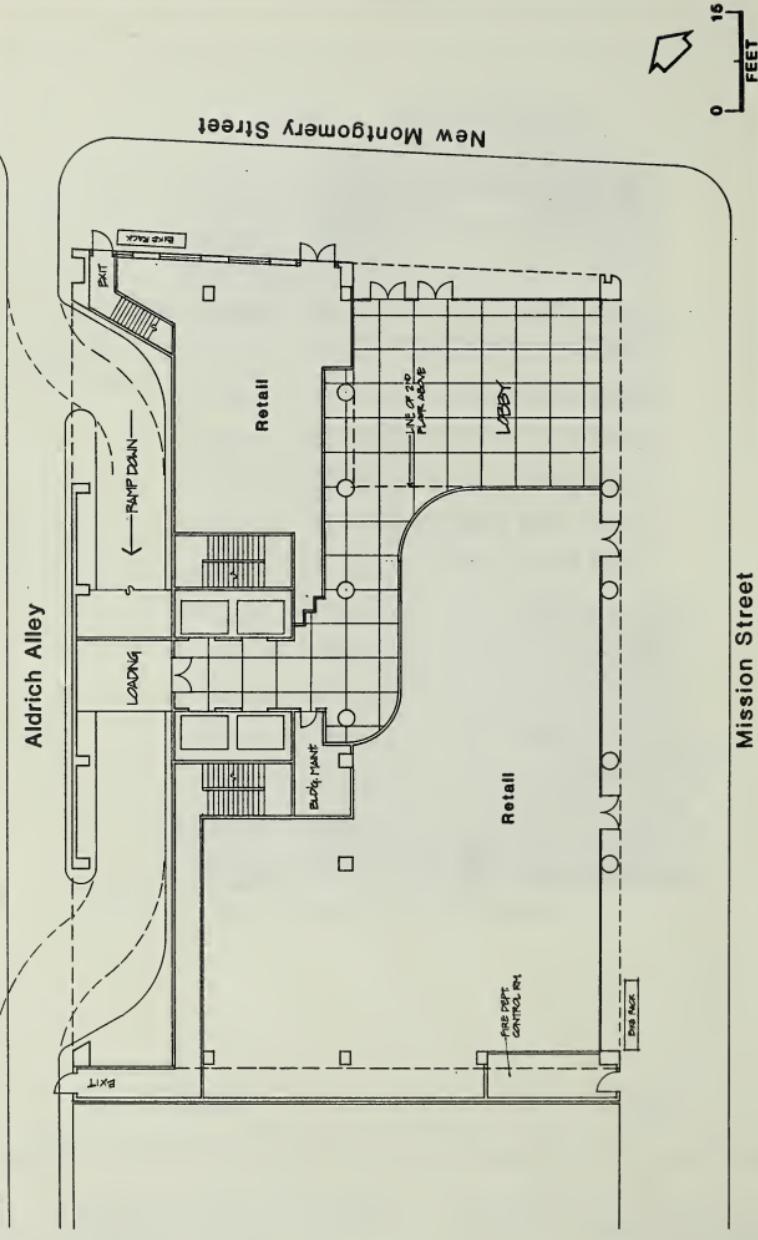


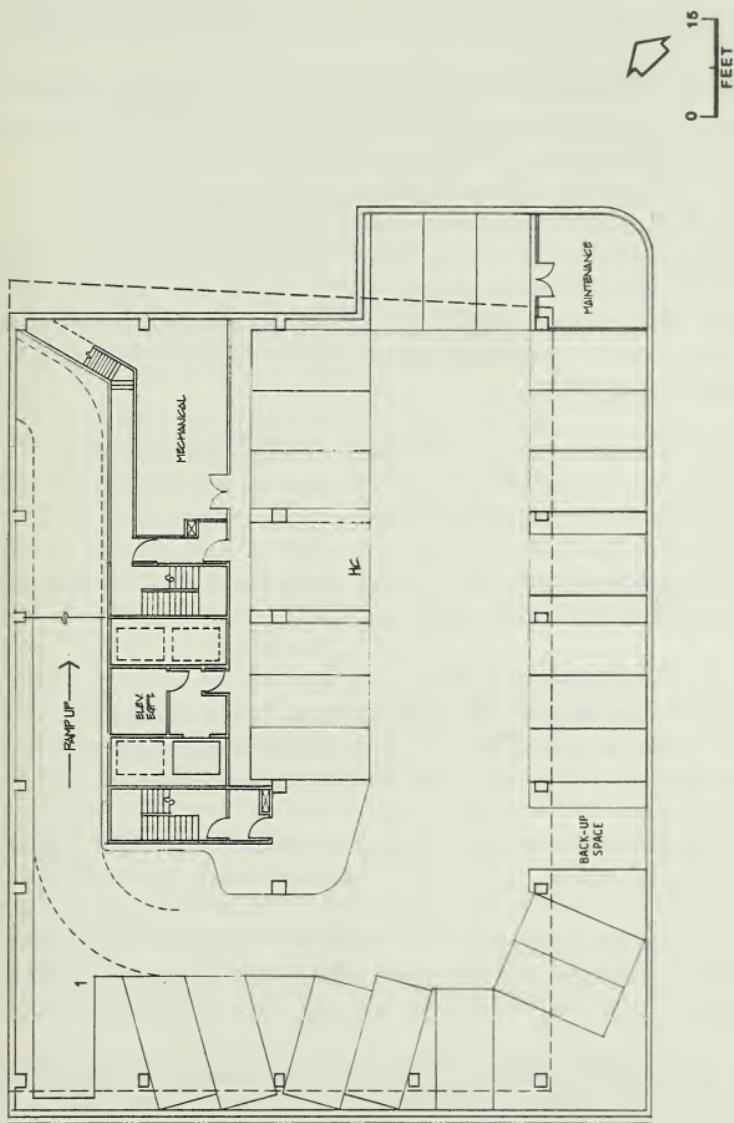
FIGURE 3: South Elevation

SOURCE: Gensler and Associates,
Architects

FIGURE 4: Ground Floor Plan

SOURCE: Gensler and Associates, Architects





SOURCE: Genstar and Associates, Architects

FIGURE 5: Basement Plan

POTENTIAL ENVIRONMENTAL EFFECTS

Potential environmental effects resulting from the proposed project include provision of parking which does not comply with policies of the Comprehensive Plan; urban design aspects, including relationship to nearby historic buildings; increased housing demand generated by the project; effects on transportation and circulation; noise impacts of pile driving during construction; cumulative air quality impacts associated with project operation and project-generated traffic; possible shadow effects; subsurface geologic conditions; energy demand; impact on the City's emergency response plans; and archaeology. These issues will be analyzed further in an EIR which will be prepared for the project.

Potential environmental issues of the proposed project that have been determined in this Initial Study to be insignificant, and therefore will not be addressed in the EIR, are discussed below.

Land Use Compatibility: The project would be consistent with land uses in the vicinity of the site and in the C-3-0 district.

Noise: After completion, project operation would not perceptibly increase noise levels in the project vicinity. Operational noise would be regulated by the San Francisco Noise Ordinance and noise insulation measures contained in the Noise Guidelines of the San Francisco Comprehensive Plan.

Wind: The project does not appear to have the potential to create adverse ground-level wind impacts in areas with significant pedestrian traffic.

Utilities and Public Services: Increased demand for public services and utilities attributable to the project would not require additional personnel or equipment.

Biology: The project would have no direct effect on plant or animal life as the site is totally occupied by a structure.

Hazards: The site and the project would neither cause nor be affected by hazardous uses or health hazards.

A. GENERAL CONSIDERATIONS:

	Yes	Maybe	No	N/A	Disc.
1. Would the project conflict with objectives and policies in the Comprehensive Plan (Master Plan) of the City?	X				X
2. Would the project require a variance, or other special authorization under the City Planning Code?			X		
3. Would the project require approval of permits from City Departments other than DCP or BBI, or from Regional, State or Federal agencies?			X		X
4. Would the project conflict with adopted environmental plans and goals?			X		

The project, which provides office space in the Financial District, would be consistent with the specific statement in the City Planning Code describing the Downtown Office District (C-3-0) as "playing a leading national role in finance, corporate headquarters and service industries, and serving as an employment center for the region."

The project generally complies with provisions of the Comprehensive Plan. The project would comply with Objective 6 of the Commerce and Industry Element of the Comprehensive Plan to "maintain and improve San Francisco's position as a prime location for financial, administrative, corporate and professional activities" and Policy 2 of Objective 6 to "maintain a compact downtown core."

The project would provide retail space on the ground floor with pedestrian entrances on Mission and New Montgomery Sts. This would comply with Policy 4 of Objective 6 in the Downtown Retail Element of the Comprehensive Plan by "providing amenities for those who live, work and use downtown."

The project provides 25 parking spaces at the basement level which may be short-term or long-term parking. Policy 4 in the Transportation Element of the Comprehensive Plan discourages provision of any long-term parking facilities. The project would reduce the number of parking spaces within the

downtown core. The existing parking garage provides approximately 100 parking spaces, so project implementation would result in a net reduction of 75 spaces. One of the parking spaces would be designed for use by physically handicapped drivers; this would comply with Policy 2 of the Transportation Plan to provide "parking facilities within and adjacent to the downtown core...for vehicles driven or operated for the physically handicapped."

A request for continued use of the subsurface parking area would be included with the application for a building permit. The area under the sidewalks is a public right-of-way and may be used by the City at any time.

B. ENVIRONMENTAL IMPACTS:

1. Land Use. Would the proposed project:

	Yes	Maybe	No	N/A	Disc.
a. Be different from surrounding land uses?	—	—	X	—	X
b. Disrupt or divide the physical arrangement of an established community?	—	—	X	—	—

The project would provide 14 floors of office space with retail uses on the ground level. Most of the surrounding land uses on New Montgomery St. are office with some retail; uses along Mission St. are primarily retail. The Call Building to the north of the site and the Crossley Building directly across New Montgomery St. from the site are both used as office space by Crocker Bank. The Rialto Building, across Mission St. from the site, is an office building with ground floor retail uses. Retail establishments such as Guaranty Office Equipment are located west of the site along Mission St.

Uses proposed for the site are consistent with surrounding land uses; this topic will not be discussed in the EIR.

2. Visual Quality and Urban Design. Would the proposed project:

	Yes	Maybe	No	N/A	Disc.
a. Obstruct or degrade any scenic view or vista open to the public?	—	—	X	—	—

	Yes	Maybe	No	N/A	Disc.
b. Reduce or obstruct views from adjacent or nearby buildings?	X				X
c. Create a negative aesthetic effect?		X			X
d. Generate light or glare affecting other properties?			X		X

The project would not obstruct any scenic view or vista now available to the public.

The project would block or reduce pedestrian views across the site from the south side of Mission St.; these views include the southern side of the Call Building above the third floor and upper elevations of office towers located on Market St. Views of the Rialto Building across the site from the northeast along New Montgomery St. would be reduced by the project.

The project would block views to the south from the Call Building and views to the north from the Rialto Building. Mid-range views to the south from upper floors in the Sheraton Palace Hotel would be reduced by the project.

The building would contain no reflective glass or high-intensity lighting and hence would not impose a reflective or glaring light on other properties.

View blockages are not extensive and no generation of glare is proposed; these effects will not receive further discussion in the EIR.

The project would change the appearance of the site, which is part of the two-block New Montgomery St. section of the Financial District, by replacing a two-story parking garage with a 15-story building (see Environmental Impacts, Cultural p. 24). Because the facade and mass of the project are different from existing buildings, urban design aspects of the project and its relationship to other buildings in the vicinity will be discussed in the EIR.

3. Population/Employment/Housing.
Would the proposed project:

	Yes	Maybe	No	N/A	Disc.
a. Alter the density of the area population?	X				X

		Yes	Maybe	No	N/A	Disc.
b.	Have a growth-inducing effect?	—	X	—	—	X
c.	Require relocation of housing or businesses, with a displacement of people, in order to clear the site?	X	—	—	—	X
d.	Create or eliminate jobs during construction and operation and maintenance of the project?	X	—	—	—	X
e.	Create an additional demand for housing in San Francisco?	X	—	—	—	X

The project would increase the number of daily employees on-site from approximately ten to approximately 520./1/ Approximately ten employees currently working in shifts at the parking garage would be displaced.

Under the formula currently used by the Department of City Planning, office uses in the project would be expected to generate a demand for approximately 112 housing units in San Francisco./2/

It can be expected that the project's estimated net 510 primary office and retail sector jobs would create an additional yet undetermined number of secondary jobs in the city's business services sector. This could have a growth-inducing effect of attracting new residents to the city.

Generation of housing demand and growth-induction will be discussed in the EIR.

NOTES - Population/Employment/Housing

/1/ Number of on-site employees estimated at the rates of: 1 employee per 250 sq. ft. of office space and 1 employee per 400 sq. ft. of retail space. Source: California Office of Planning and Research, January 1978, Economic Practices Manual, pp. 35-37.

/2/ Housing demand was calculated with the formula provided in a memorandum by Dean Macris, Director of Planning, July 20, 1981:

Gross square feet of office space x 0.22 = number of housing units required
250 sq. ft. per employee

4. Transportation/Circulation.

Would the construction or operation of the project result in:	Yes	Maybe	No	N/A	Disc.
a. Change in use of existing transportation systems (transit, roadways, pedestrian ways, etc.)?	X				X
b. An increase in traffic which is substantial in relation to existing loads and street capacity?		X			X
c. Effects on existing parking facilities, or demand for new parking?	X				X
d. Alteration to current patterns of circulation or movement of people and/or goods?	X				X
e. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?		X			X
f. A need for maintenance or improvement or change in configuration of existing public roads or facilities?	X				X
g. Construction of new public roads?			X		

Increased employment at the site would impose increased demands on all existing public and private transportation, including Muni, BART, Golden Gate Transit, AC Transit, SamTrans, and the Southern Pacific RR. Project parking demands would not be met with on-site parking and would not be accommodated by existing parking near the project. Available parking would be reduced by 75 spaces. Aldrich Alley would be widened to a ten-ft. driveway to facilitate truck access to the loading dock. Project-related impacts and cumulative transportation/circulation impacts will be analyzed in the EIR.

5. Noise.

	Yes	Maybe	No	N/A	Disc.
a. Would the proposed project result in generation of noise levels in excess of those currently existing in the area? (during construction)	X				X
b. Would existing noise levels impact the proposed use?			X		
c. Are Title 25 Noise Insulation Standards applicable?			X		

Project Construction

Project construction would require approximately 18 months and would involve demolition of the existing garage, excavation, and construction of the proposed structure. Construction noise associated with site development would temporarily increase noise levels in the project vicinity. Persons in the offices and retail establishments located adjacent to the site would be the most sensitive receptors of construction noise. Temporary and intermittent noise impacts would result from the use of impact pile driving equipment which may be needed for foundation preparation. Exterior noise levels could reach 85 dBA at 50 ft.; interior noise levels at structures adjacent to the site could reach 71 dBA. Construction noise at these levels would interfere with normal speech.

The San Francisco Noise Ordinance limits noise emissions from powered construction equipment, with the exception of impact tools, to 80 dBA at a distance of 100 ft. The project contractor would adhere to this limit for all equipment, other than impact tools. Pile driving equipment does not comply with the provisions of the Noise Ordinance; a limitation of the hours of construction where such equipment is used may be required under the ordinance. The project sponsor has agreed to mitigation measures listed on p. 25 to reduce the effects of pile driving and other construction noise. Further consideration will be given to this issue in the EIR.

Project Operation

Typical of downtown San Francisco, the noise environment of the site is dominated by vehicular traffic noise. The Environmental Protection Element of the San Francisco Comprehensive Plan indicates a day-night average noise level (L_{dn}) of 70 dBA on New Montgomery and Mission Sts. adjacent to the site in 1974.^{1,2/} The Environmental Protection Element contains guidelines for determining the compatibility of various land uses with different noise environments. For office uses the guidelines recommend no special noise control measures in an exterior noise environment up to an L_{dn} of 70 dBA. For this noise level, the guidelines require an analysis of noise reduction

requirements and inclusion of noise insulation features in the building design. As this will be done by the project sponsor, no further analysis is needed in the EIR.

Project operation would not result in noise levels greater than those presently existing in the area. The amount of traffic generated by the project during any hour of the day, and cumulative traffic increases at the time of project completion, would cause traffic noise levels to increase by less than one dBA. To produce a detectable increase in environmental noise, a doubling of existing traffic volumes would be required; traffic increases of this magnitude would not occur with anticipated cumulative development.

Mechanical equipment noise is regulated by the San Francisco Noise Ordinance, San Francisco Municipal Code, Section 2909, "Fixed Source Noise Levels," which the project sponsor is committed to follow. The project site and surrounding area are zoned C-3-0. In this zone, the ordinance limits equipment noise levels at the property line to 70 dBA between 7 a.m. and 10 p.m. and 60 dBA between the hours of 10 p.m. and 7 a.m. During lulls in traffic, mechanical equipment generating 70 dBA would dominate the site noise environment. As equipment noise levels would be limited to 60 dBA to meet the nighttime limit, they would not be perceptible within the sound-level context of the project. Further discussion of operational noise will not be included in subsequent environmental documentation for the project.

NOTE - Noise

/1/ dBA is a measure of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound.

/2/ L_{dn} , the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises (noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise).

6. Air Quality/Climate.

Would the proposed project result in:

	Yes	Maybe	No	N/A	Disc.
a. Violation of any ambient air quality standard or contribution to an existing air quality violation?	X				X
b. Exposure of sensitive receptors to air pollutants?		X			X
c. Creation of objectionable odors?			X		
d. Burning of any materials including brush, trees, or construction materials?			X		
e. Alteration of wind, moisture, or temperature (including sun shading effects), or any change in climate, either locally or regionally?	X				X

Concentrations of air pollutants in San Francisco are monitored by the Bay Area Air Quality Management District (BAAQMD) at 900 Twenty-third St., about two miles south of the site. Prior to 1980, a BAAQMD monitoring station was also located at Van Ness Ave. and Ellis St. Air quality data collected by the BAAQMD at both locations show that San Francisco experiences infrequent exceedances of the ambient air quality standards for ozone, carbon monoxide, and total suspended particulate.

Two types of air quality impacts could be expected from this project: short-term impacts from construction activity, and long-term impacts related to use and operation of the structure. Climatic conditions in downtown San Francisco allow rapid dispersal of air pollutants, so local stationary sources of emissions rarely create a measurable impact at monitoring stations. Rather, their impact is to add to regional accumulations of pollutants. Thus the project would probably not result in direct exceedance of any air quality standard, although it would contribute to existing exceedances.

Project Construction

Demolition, excavation, and construction activities would affect local air quality for approximately 18 months. Grading and other construction activities would cause a temporary increase in particulate and hydrocarbon emissions. These emissions would be carried by prevailing winds and probably would not cause emissions standards to be violated at the monitoring station. Without mitigation, construction-generated dust might cause exceedances of the particulate standard in the immediate project area. Dustfall may occur on surfaces within 200 to 800 ft. of the project site under low winds. Blowing dust may be an annoyance in the vicinity of the site when winds exceed 12 miles per hour. Construction dust is composed primarily of large particles that settle out of the atmosphere rapidly with increasing distance from the source. Thus it is more of a nuisance than a health hazard, except to sensitive receptors such as those with respiratory diseases.

Diesel powered construction equipment would emit, in decreasing order by weight, nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulate. This would increase local concentrations temporarily but would not be expected to increase the frequency of exceedances of air quality standards. Pouring asphalt and applying certain architectural coatings would release hydrocarbons.¹¹ Although ambient concentrations of these pollutants would be increased for the duration of the construction period, no increases in measured concentrations at the Twenty-third St. monitoring station are expected to occur.

The project sponsor has agreed to the mitigation measures listed on p. 25; therefore, construction air quality impacts will not be discussed in the EIR.

Project Operation

Project operation and related activities, such as project-generated traffic, would incrementally degrade air quality and impede regional efforts to attain and maintain air quality standards. Combustion of natural gas for space and water heating would generate small amounts of pollutants in the project area. Electrical energy consumption would place an increased demand on local

generation plants, possibly resulting in greater emissions from these facilities. Further environmental documentation is necessary to determine the effect of project operation on roadside concentrations of carbon monoxide and regional emissions of pollutants, and on the frequency of violation of the standards; this will be discussed in the EIR.

Wind

West and northwest winds prevail in San Francisco; the project is moderately exposed to northwest and west winds above the level of the Call Building./2/ Aldrich Alley is so narrow that aerodynamically, with northwest winds, the Call Building and the project would act as one structure, and wind accelerations would occur above ground level along the narrow eastern and western faces of the building. A westerly wind would accelerate moderately as it passes through Aldrich Alley, which is seldom used by pedestrians. Pedestrians along New Montgomery St. would experience higher winds as they passed Aldrich Alley, but friction along the relatively narrow 14.5-ft. passageway would limit the severity of the wind acceleration./3/ Pedestrian areas adjacent to the building along Mission St. would experience generally lighter winds due to the shelter offered by the building. The project does not appear to have the potential to create adverse ground-level wind impacts in areas with significant pedestrian traffic; therefore no further analysis is necessary./2/

Shadows

The project would cast new shadows on the Call Building, the Sheraton Palace Hotel including the Garden Court, and buildings located east of the project between New Montgomery and Second Sts. A complete shadow analysis will be included in the EIR for the project.

NOTES - Air Quality/Climate

/1/ These types of emissions are controlled by Regulations 3 and 9, respectively, of the BAAQMD: BAAQMD, Regulation 3 (reactive organic gas emissions) adopted January 4, 1967; and Regulation 9 (architectural coatings) adopted March, 1978. The project contractor would comply with these regulations.

/2/ Donald Ballanti, Certified Consulting Meteorologist, Wind Impact Evaluation for the Proposed 90 New Montgomery Street Building, November, 1981, prepared for Environmental Science Associates, Inc.

/3/ Donald Ballanti, Certified Consulting Meteorologist, letter, January 7, 1982.

7. Utilities and Public Services.

Would the proposed project:

	Yes	Maybe	No	N/A	Disc.
a. Have an effect upon, or result in a need for new or altered, governmental services in any of the following?					
fire protection			X		X
police protection		X			X
schools		X			
parks or other recreational facilities		X			
maintenance of public facilities		X			
power or natural gas		X			X
communications systems		X			
water		X			
sewer/storm water drainage		X			X
solid waste collection and disposal		X			X

Fire Protection: The project would increase building floor area on this site by about 400 percent and would increase the number of persons employed on the site from 10 to 520. This would not result in a need for additional Fire Department personnel or equipment./1/ The project would incorporate all emergency response systems stipulated by the Life Safety Code, including fire alarms, an emergency communication system, an emergency power supply and an on-site emergency water supply. These measures would reduce hazards to building occupants during an earthquake or fire.

Police Protection: The project would increase population and private property on the site, thus increasing the opportunity for crime. The project site is within the Southern Police District with headquarters at 850 Bryant St. The

area is patrolled at all hours by radio-dispatched patrol cars. The Police Department does not expect to require additional police personnel or equipment to serve the project./2/

Power or natural gas: Gas and electricity would be provided by Pacific Gas and Electric. PG&E would anticipate no problems in supplying these utilities for the project./3/

Water: The project site is served by mains located on New Montgomery and Mission Sts. The project would result in a net increase in water use at the site of approximately 16,400 gallons per day. This is a 12-inch main in Mission St. and an 8-inch main in New Montgomery St.; these existing mains have sufficient capacity and pressure to handle the additional demand./4/

Sanitary Sewer: The site is served by 3-foot by 5-foot combined storm and sanitary sewers located on Mission and New Montgomery Sts. The project would generate an estimated additional 16,400 gpd of wastewater per day. The sewer serving the site has sufficient capacity to carry the additional load and no expansion of the present collection and treatment system would be required to serve the project./5/

Solid Waste Disposal: The project would generate about 0.7 tons of solid waste per day. Golden Gate Disposal Company serves the site and anticipates no problems in meeting collection demand./6/ Disposal of municipal solid wastes presently occurs at a landfill site in Mountain View. The contract with this facility expires in October 1983. The City is presently negotiating with other landfill sites to accept San Francisco's solid waste on an interim basis until a solid waste program is implemented in late 1986. The solid waste program would consist of intensified recycling, a resource recovery project generating electricity from the burning of solid wastes, and landfill disposal of bypass and residue wastes from the resource recovery process. The project and cumulative development are not expected to present problems in solid waste disposal upon implementation of the solid waste program./7/

All utilities and public services could serve the project with existing capacity; this topic will not be discussed in the EIR.

NOTES - Utilities and Public Services

/1/ Chief Joseph A. Sullivan, Division of Support Services, San Francisco Fire Department, letter, November 18, 1981.

/2/ Sergeant James Farrell, Division of Planning and Research, San Francisco Police Department, telephone conversation, November 16, 1981.

/3/ Herbert C. Luders, Industrial Power Engineer, Pacific Gas and Electric, telephone conversation, January 6, 1982.

/4/ J.E. Kenck, Manager, San Francisco Water Department, letter, November 25, 1981.

/5/ Nathan Lee, Engineering Associate II, Division of Sewer System Design, San Francisco Clean Water Program, telephone conversation, November 10, 1981.

/6/ Fiore Garbarino, Treasurer, Golden Gate Disposal Company, telephone conversation, November 16, 1981.

/7/ David Gavrich, Assistant Manager for Solid Waste Management, Chief Administrative Office, Special Projects, City of San Francisco, telephone conversation, January 6, 1982.

8. Biology

	Yes	Maybe	No	N/A	Disc.
a. Would there be a reduction in plant and/or animal habitat or interference with the movement of migratory fish or wildlife species?	—	—	X	—	—
b. Would the project affect the existence or habitat of any rare, endangered or unique species located on or near the site?	—	—	X	—	—
c. Would the project require removal of mature scenic trees?	—	—	X	—	—

9. Land. (topography, soils, geology) Would the proposed project result in or be subject to:

a. Potentially hazardous geologic or soils conditions on or immediately adjoining the site? (slides, subsidence, erosion, and liquefaction)	X	—	—	—	X
b. Grading? (consider height, steepness and visibility of proposed slopes; consider effect of grading on trees and ridge tops)	—	X	—	—	X

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
c. Generation of substantial spoils during site preparation, grading, dredging or fill?		X			X

A review of available geologic data indicates the site is underlain by artificial fill and/or dune sand./1,2/ Artificial fill is generally not considered suitable for support of multi-storyed buildings. The site is also mapped as being in an area of major potential subsidence hazard and major liquefaction potential hazard./1/ Groundshaking is expected to be "strong" on the site for a major earthquake of the 1906 type. The project structure would be supported on piles designed and constructed under the supervision of a structural and geotechnical engineer./3/ Project design would comply with all applicable seismic and life safety standards.

The extent of grading and amount of material to be removed has not yet been determined. The existing parking garage has a basement level which extends beneath the sidewalks surrounding the project; a request for continued use of the subsurface parking area would be included with the application for a building permit./4/ Shoring is not expected to affect adjacent structures./3/ The project sponsor would post a surety bond, if required by the San Francisco Department of Public Works, before issuance of a permit to excavate. Such a bond would protect the City against damages to City-owned sidewalks, streets and utilities.

All used material resulting from demolition of the existing structure would be removed from the site. A discussion of grading and foundation design will be included in the project EIR.

NOTES - Land

/1/ URS/John A. Blume and Associates, 1974, San Francisco Seismic Safety Investigation

/2/ Schlocker, Julius, 1974, Geology of the San Francisco North Quadrangle, California (USGS Professional Paper 782)

/3/ Peter Gordon, Architect, Gensler and Associates, letter, November 4, 1981.

/4/ Nelson Wong, Associate Traffic Engineer, Department of Public Works, telephone conversation, January 6, 1982.

10. Water.

Would the proposed project result in:

	Yes	Maybe	No	N/A	Disc.
a. Reduction in the quality of surface water?	—	—	X	—	X
b. Change in runoff or alteration to drainage patterns?	—	—	X	—	X
c. Change in water use?	X	—	—	—	X
d. Change in quality of public water supply or in quality or quantity (dewatering) of groundwater?	—	X	—	—	X

The project would not reduce the quality of surface water, change the amount of runoff from the site, or alter drainage patterns, because the site is now entirely covered with impermeable surfaces. The project would increase water use on the site. Current water use on the site is about 600 gallons per day (gpd). The project would use about 17,000 gpd, increasing water use on the site by about 16,400 gpd.

Until a soils study, which is now being prepared, is completed, it is not known whether dewatering would be required. However, depending on the depth of excavation and the depth of groundwater, similar projects in the site vicinity have required dewatering in the past. See Section C for mitigation measures should dewatering be required. The extent and effects of dewatering will be discussed in the project EIR.

11. Energy/Natural Resources. Would the proposed project result in:

	Yes	Maybe	No	N/A	Disc.
a. Any change in consumption of energy?	X	—	—	—	X
b. Substantial increase in demand on existing energy sources?	—	—	X	—	X
c. An effect on the potential use, extraction, conservation or depletion of a natural resource?	X	—	—	—	X

Site development, building construction, and production and transportation of building materials would consume energy derived from non-renewable resources. When occupied, the project would increase energy consumption at the site by providing about 132,600 sq. ft. of new floor space for office and retail activities. The project would contribute to cumulative energy consumption in downtown San Francisco which would result in depletion of non-renewable energy resources. Energy consumption will be discussed in the project EIR.

12. Hazards. Would the proposed project result in:

	Yes	Maybe	No	N/A	Disc.
a. Increased risk of explosion or release of hazardous substances (e.g., oil, pesticides, chemicals or radiation), in the event of an accident, or cause other dangers to public health and safety?	—	—	X	—	—
b. Creation of or exposure to a potential health hazard?	—	—	X	—	—
c. Possible interference with an emergency response plan or emergency evacuation plan?	—	X	—	—	X

The project would incorporate all emergency response systems stipulated by the Life Safety Code, including fire alarms, an emergency communication system, an emergency power supply and an on-site emergency water supply. These measures would reduce hazards to building occupants during an earthquake or fire.

The project would increase the City's daytime population; employees in the proposed building would contribute to congestion if an emergency evacuation of Downtown were required. The potential impact of the project on the City's emergency response plan will be considered in the project EIR.

13. Cultural. Would the proposed project:

	Yes	Maybe	No	N/A	Disc.
a. Include or affect a historic site, structure or building?	X	—	—	—	X
b. Include or affect a known archaeological resource or an area of archaeological resource potential?	—	—	X	—	—
c. Cause a physical change affecting unique ethnic or cultural values?	—	—	X	—	X

The site is approximately 1,260 feet west of the historic San Francisco Bay shoreline./1/ Archaeological resources of prehistoric age may exist on or near the project site. This topic will be discussed in the project EIR. If any artifacts were to be discovered during site excavation, the project sponsor has agreed to the mitigation measure on p. 27 to provide protection.

The project site is on New Montgomery St. where several architecturally significant buildings are located./2/ Effects of the project on these buildings and the surrounding area will be discussed in the EIR.

NOTES - Cultural

/1/ Schlocker, Julius, 1974, Geology of the San Francisco North Quadrangle, California (USGS Professional Paper 782)

/2/ Foundation for San Francisco's Architectural Heritage, 1979, Splendid Survivors

C. MITIGATION MEASURES:

	Yes	No	Disc.
Are mitigation measures included in the project?	X	—	X
Are other mitigation measures available?	X	—	—

Mitigation Measures currently proposed as part of the project include the following:

TRANSPORTATION/CIRCULATION

- Vehicle-activated signals would be installed at both ends of the garage ramp, to prevent head-on conflicts between inbound and outbound vehicles on the one-lane ramp and to warn pedestrians on the sidewalk of the approach of outbound vehicles.

- The curb-to-curb width of Aldrich Alley would be increased by three feet for the length of the site to facilitate access to the enclosed loading dock. This would be done by the project sponsor pursuant to discussion (December 30, 1981) with the Department of Public Works.

NOISE

- The project contractor would muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible.

AIR QUALITY/CLIMATE

- During excavation, unpaved demolition and construction areas would be wetted to hold down dust; if this were done at least twice a day with complete coverage, particulate emissions (dust) would be reduced about 50%.
- The general contractor would maintain and operate construction equipment in such a way as to minimize exhaust emissions.
- The general contractor would use water-based or latex paints on all interior drywalls painted, rather than oil-based paints, which emit hydrocarbons while drying. This would reduce hydrocarbons from drying paint by about 60%.

UTILITIES AND PUBLIC SERVICES

- The project would incorporate low-flow faucet and toilet fixtures to reduce water consumption and wastewater.
- The project would be equipped with a trash compactor to reduce the volume of solid waste requiring storage and transport. Separate storage facilities for recyclable waste material would be provided for office use.

LAND (Topography, Soils, Geology)

- A detailed foundation and structural design study would be conducted for the building by a licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.
- The project would have a pile foundation, which would resist hazards such as liquefaction, subsidence, and unstable subsurface conditions (artificial fill). A pile foundation would also provide some measure of protection against seismic forces.
- Excavation pit walls would be shored up and protected from slumping or lateral movement of soils into the pit. Shoring and sheeting with soldier beams could be used for this purpose. The contractor would comply with the Excavation Standards of the California Occupational Safety and Health Agency (Department of Industrial Relations).

WATER

- Should dewatering be necessary, subsidence in surrounding buildings and streets would be monitored by the project sponsor to insure that damage is kept to a minimum. Dewatering would cease should excessive subsidence occur. If any adjacent structures are supported on wet wood piles, a method would be devised to keep the piles moist during construction.

ENERGY

- Wherever possible, office suites would be equipped with individual light switches, fluorescent lights, and other energy saving devices as appropriate to conserve electric energy.

CULTURAL

- Should evidence of cultural or historic artifacts of significance be found during project excavation, the Environmental Review Officer and the

President of the Landmarks Preservation Advisory Board would be notified. The project sponsor would select an archaeologist to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, could be implemented to preserve or recover such artifacts. The Environmental Review Officer would then recommend specific mitigation measures, if necessary, and recommendations would be sent to the State Office of Historic Preservation. Excavation or construction which might damage the discovered cultural resources would be suspended for a maximum of four weeks to permit inspection, recommendation and retrieval, if appropriate.

Other available mitigation measures will be discussed in the EIR.

D. ALTERNATIVES: Yes No Disc.

Were other alternatives considered: X X

These alternatives will be discussed in greater detail in the EIR for this project.

1. The Proposed Controls Alternative would be a building designed to meet the criteria outlined in Guiding Downtown Development, published in May 1981 by the Department of City Planning. Height and bulk proposed for the site is 500-S; the proposed FAR would be 12:1. The building would be a 12-story office building with ground level retail similar to the proposed project.
2. The Mission St. Dock Alternative would provide a loading dock with access from and egress to Mission St.
3. The Pass-through Dock Alternative would provide a loading dock with access from Aldrich Alley and egress on Mission St.
4. The Housing Alternative would be a mixed-use project providing on-site housing equal to the demand created by the office space.

5. The No-Parking Alternative would eliminate the 25-space parking garage in the basement level of the proposed project.
6. The Parking Alternative would retain the existing number of parking spaces with office space provided in a structure above the garage.
7. An Historic Alternative would be a structure designed with a height which matches the Call Building and which is sympathetic to its detailed facade.
8. The No-Project Alternative would continue the use of the existing parking garage.

E. MANDATORY FINDINGS OF SIGNIFICANCE:

	<u>Yes</u>	<u>No</u>	<u>Disc.</u>
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal, or eliminate important examples of the major periods of California history or prehistory?	—	X	—
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	—	X	—
3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable?	X	—	X
4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?	—	X	—
5. Is there a serious public controversy concerning the possible environmental effect of the project?	—	X	—

The project would contribute to the effects of cumulative development on housing demand, transportation systems, air quality, and energy demand.

